



ETHICAL CODE



Foreword

Having a positive impact on society involves making decisions and taking action. Holding this firm conviction is the only way we will be able to move towards a **more equitable and just society** that values and drives **people’s talent and development** and ensures a **liveable planet** for ourselves and future generations.

Our intention of act *for good* is simply a firm commitment to society, people, and the planet.

These three areas of action form an umbrella for a number of principles and values, which you will find below. These are the principles that govern our relationship with our customers, patients, our business partners and society.

At Ferrer, we are not only committed to complying with current regulations, but we go one step further, as we know we can only achieve our objectives through **integrity and honesty**. We make every effort to ensure our work is based on ethical principles, because we pay attention to results and how we achieve them, in full awareness that integrity must be the foundation for making all our decisions.

We can rely on your full commitment in terms of applying and promoting the principles contained herein to contribute to Ferrer’s sustainable success and, ultimately, to our purpose *for good*.

Thank you very much,

Sergi Ferrer-Salat
President

Mario Rovirosa
CEO



Foreword	Commitment to Society	Commitment to Patients and Innovation	Product information, promotion and advertising	Working at Ferrer	Business Integrity	Shared Responsibility	Contact us
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Commitment to society

Ferrer's commitment

At Ferrer, we aim to make a positive impact through various courses lines of action and we work hard to give as much as possible back to society. For Ferrer, the pharmaceutical business is a means to implement substantial social and environmental change.



Human rights

At Ferrer, we treat everyone fairly and respectfully, without exception, and we are committed to the protection of internationally proclaimed human rights.

Our goal is to grow in a sustainable way, protecting and promoting human rights while carrying out our business activity.

In all the markets in which we operate directly or through our business partners, we comply with the applicable regulations on working hours, salary and working conditions. We do not tolerate child labour or the use of illegal, abusive or forced labour in the research, manufacture, distribution and marketing of our products.

As members of global value chains, we encourage our suppliers to also commit to respecting and protecting human rights.

What do I need to do?

- Enforce human rights for both you and your peers.
- Contact Sustainability if you have any doubts.



The Environment

At Ferrer, we want to help guarantee a liveable on a habitable planet, both for our own benefit and for future generations.

Sustainability is a priority in all our centres.

At Ferrer:

- We are committed to mitigating our greenhouse gas emissions. We calculate our carbon footprint and establish actions to reduce our impact on climate change.
- We have implemented ISO 14001 Environmental Management Systems in our centres.
- Our electricity comes from renewable sources and we carry out energy audits with the goal of moving towards energy decarbonisation.
- We integrate sustainable building criteria into the way our centres and buildings are constructed.
- We have a Sustainable Mobility Plan.
- We promote circular economy by focusing on green designs for our packaging and through proper waste management.
- We continuously improve the management and treatment of waste and emissions, through the necessary space and storage management.
- We are committed to applying environmental sustainability criteria to our purchases, and to developing alliances through our supply chain.
- We carry out awareness-raising and training actions in relation to environmental matters.
- At Ferrer, we carry out audits to ensure we comply with all the legal environmental requirements.

The Environment

How do I need to act?

- Attend training courses on environmental issues.
- Reduce the amount of waste you generate; reuse and recycle.
- Commit to sustainable mobility for travel.
- Print only when strictly necessary and in black and white.
- Turn off your lights and computer devices at the end of the working day.
- Contact the Sustainability Department if you have any doubts.



Philanthropic vocation and social action

At Ferrer, we don't turn our back on what's going on around us. We engage in activities and collaborate on social projects that create benefits for people in vulnerable situations. We participate in initiatives across a wide range of areas and work with associations and foundations so that they can continue to carry out their key work.

We act with a global conscience, promoting patronage and corporate volunteering to strengthen social commitment and contribute to the creation of a better society.

What do I need to do?

- Support social activities and projects.
- Contact the Sustainability Department if you have any doubts.



Commitment to Patients and Innovation

Ferrer's commitment

Our goal is to contribute to people's wellbeing by providing innovative solutions that improve quality of life.



Patients

Patient safety comes first. At Ferrer, we provide consumers and healthcare professionals with reliable, clear and up-to-date information about our products.

We are committed to having a close relationship with patients, working alongside them to develop the best comprehensive solutions that allow them the greatest possible wellbeing.

We have effective mechanisms in place so that any possible adverse reactions, complaints or issues related to the safety of our products can be easily communicated to patients and consumers. We treat any such communications with the utmost seriousness to ensure prompt and diligent action if product recall is necessary.

All our medicines are constantly monitored, even if there are no specific alerts.

At Ferrer, we have several channels of care and communication with patients, consumers and healthcare professionals to manage queries related to medical information and the safety and quality of our products.

At Ferrer, we also carry out outreach, support and ongoing collaboration with patient associations in an honest and transparent manner, with the sole purpose of contributing to the wellbeing of society.

What do I need to do?

- Make sure the information you provide is complete, clear, and up-to-date.
- Contact the Pharmacovigilance department immediately if you receive any communications about adverse reactions or the safety of our products, or if you have any doubts about how to proceed in these situations.
- For more information about our products, please contact the Medical Department.

Innovation and quality

At Ferrer, we are committed to researching and developing new treatment alternatives aimed at responding to unmet medical needs, generating value for patients, professionals and health organisations, as well as for society in general.

To this end, we advocate for ethical collaboration with third parties and aim to involve a range of different stakeholders (healthcare professionals, managers and patients).

- We ensure that both patients and volunteers participating in clinical trials give their free and informed consent , and make sure they understand the purpose of their research and are not exposed to unnecessary risks.
- We follow strict research protocols and standards, prioritising the safety and wellbeing of patients.
- We respect and protect your data privacy and confidentiality.

At Ferrer, we focus on marketing pharmaceutical products that are marked by aspects of innovation and differentiation, and we offer trusted products in accordance with the highest European quality and safety standards.

We also have a quality system in place with its own policies and procedures, as well as a continuous quality evaluation and monitoring system that is complemented by annual internal audits.

What do I need to do?

- Make sure you have the free and informed consent of volunteers and/or patients participating in clinical trials.
- Ensure that clinical trials pass the internal authorisation processes and meet regulatory standards.
- Only share trial data with those who should have access to it and, where possible, share the data anonymously.
- Contact the Quality Department if you have any questions about how to proceed in these situations.

Product information, promotion and advertising

Ferrer's commitment

At Ferrer, we work to ensure our products are used safely, providing complete, reliable and up-to-date information about them. All our advertising and promotional activities are in line with best practices.



Information, promotion and advertising

We provide information on our products and carry out promotional and marketing activities in a transparent, accountable and ethical manner. Therefore, in addition to complying with applicable legislation, Ferrer complies with the self-regulatory sectoral codes that apply in the countries where we operate.

At Ferrer, we ensure that all advertising and promotional information about our products is clear, legible and easy to understand. We ensure advertising complies with the information on product data sheet for medicinal products, packaging and instructions for the use of our products.

To this end, the staff who carry out the promotion and advertising for our products are trained and have the appropriate medical knowledge to act ethically in the market and make sure all our advertising is honest and truthful.

The aim of interactions with healthcare organisations and professionals is the legitimate exchange of scientific information that is of ultimate benefit to patients.



Information, promotion and advertising

What do I need to do?

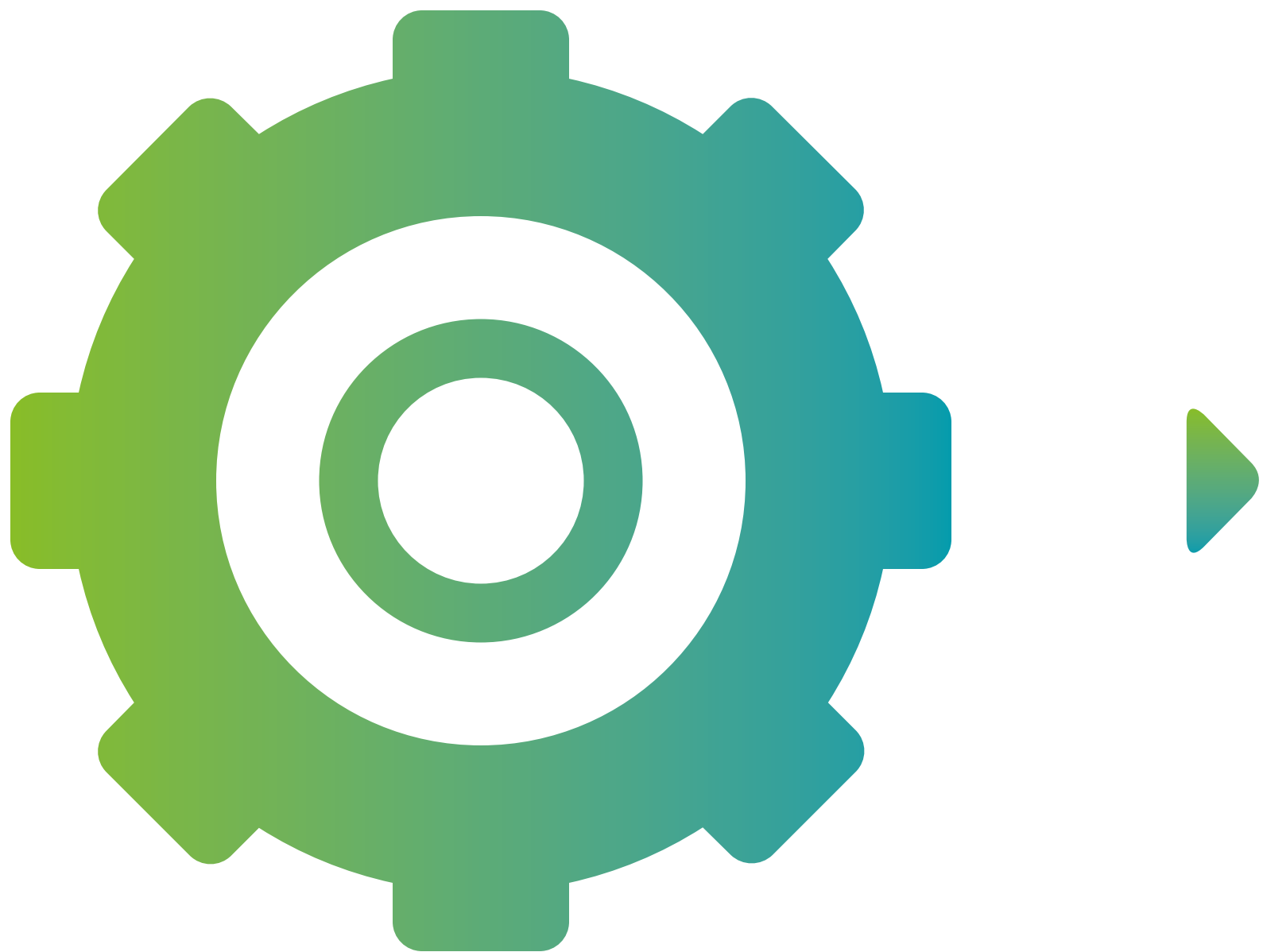
- Comply with Ferrer’s internal standards, as well as legislation and industry code of conduct on interactions with healthcare professionals (e.g. hospitality, events, medical visits and training).
- Make sure to follow internal approval procedures for promotional activities and materials. You are responsible for all the information you publish about Ferrer’s products and those of our partners.
- Make sure your claims are supported by up-to-date scientific evidence or current product technical information. Make sure not to publish confusing statements.
- Do not promise or offer anything of value to a healthcare professional, healthcare organisation, or patient organisation for the purpose of inducing them to purchase, prescribe, use, distribute, or recommend our products (not including business discounts or rebates).
- Be sure to report the necessary information so that value transfers to healthcare professionals are always transparent.
- Do not post content about our products or our competitors’ products on social media, unless you have obtained prior internal authorisation.
- Do not provide Ferrer merchandise to healthcare professionals or consumers unless they are samples that have been approved in advance via the appropriate internal channels.
- Contact the Ethics & Compliance Department if you have any doubts.

Working at Ferrer

Ferrer's commitment

At Ferrer, we put people first, and we are committed to encouraging talent and development.

That's why we help the employees who work with us to develop their profiles freely, fairly and equally, and always with respectful, friendly and humane treatment.



Relationships based on trust and responsibility

At Ferrer, we care about the people who are part of our organisation. One of the essential factors to achieve our objectives is that our collaborators work from a relationship based on **trust and responsibility**.

Therefore, when the work position allows, we offer different work options and provide tools so that each employee can find the right work formula for them, and organise their work according to their priorities and objectives.



What do I need to do?

- Act in an honest and professional way; in line with the trust Ferrer has placed in you.
- Let your manager know your needs to strike the right work/life balance.
- Make sure you find the right work formula for your career priorities and goals.
- Contact your HR Business Partner if you have questions or concerns.

Health and safety

At Ferrer, we protect the physical and mental health of our professionals and guarantee the safest working conditions for all of them, making sure to dedicate the energy and attention required to protect them.

At Ferrer, we believe that accidents in the workplace can be avoided by dedicating sufficient and adequate resources to occupational safety. That's why we constantly work to improve our performance in matters related to Occupational Safety, Health and Welfare.

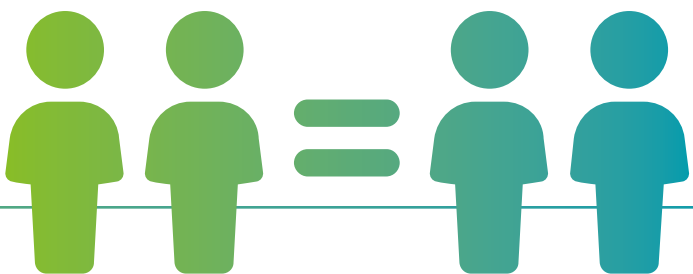
At Ferrer, we make sure to comply with our legal and contractual obligations regarding occupational risk prevention, and we expect the same levels of commitment from our partners and contractors.



What do I need to do?

- Act responsibly and in accordance with occupational risk prevention standards and remember that your individual behaviour influences our brand and the safety of other professionals.
- Comply with all procedures and protocols established to guarantee your health and safety and that of your colleagues in the workplace.
- Actively participate in all the actions promoted by Ferrer that aim to build and encourage a true culture of risk prevention.
- Contact the Health & Safety Department if you have any doubts.

Equality, diversity and inclusion, anti-discrimination and anti-harassment



At Ferrer, we interact with our colleagues with respect for diversity and equal opportunities, and we will not tolerate any discrimination based on sex, age, ethnicity, race or any other circumstance.

We assess and promote a range of people, perspectives, talent and experiences.

At Ferrer, we do not tolerate any form of discrimination or harassment, neither towards colleagues in the workplace, nor in any professional environment in which Ferrer works.

At Ferrer, we contribute to equity between men and women in the company and to the integration of equal opportunities in the strategy and culture of the organisation. We also respect the freedom of association.

At Ferrer, we have a protocol for preventing sexual harassment based on gender, sexual orientation and identity and handling it within the company.

At Ferrer, we carry out work environment surveys so we can respond to any workplace needs identified.

What do I need to do?

- Avoid making comments or jokes that may be considered offensive by other Ferrer employees or by any third parties you deal with as part of your work.
- Ensure any new members joining your team have the best possible experience, and encourage their integration into Ferrer.
- Listen and give your opinion from a place of respect and good manners.
- Use inclusive language.
- Contact your HR Business Partner if you have any doubts.

Business Integrity

Ferrer's commitment

Doing things right is the key to success.

Make sure to act with **integrity and honesty** in all the work you do.

At Ferrer, we make sure that everyone who is part of Ferrer, as well as our business partners, act in accordance with our values.



Honesty in relations with third parties

It is very important to us to maintain the trust that third parties place in us, whether they are suppliers, customers, business partners or other third parties, and whether they are from the public or private sector. Therefore, we make sure to treat them with total professionalism, transparency, honesty, loyalty and respect, always providing them with truthful information and data.



What do I need to do?

- Act professionally with any third parties you deal with. Their trust is a very important asset to Ferrer.
- Do not share false or misleading information.
- Contact the Ethics & Compliance Department if you have any doubts.

Conflicts of interest

At Ferrer, we take the necessary and appropriate preventive measures to avoid conflicts of interest that may affect our reputation or the trust that third parties place in us.

At Ferrer, we are committed to managing conflicts of interest by considering the interests of both Ferrer and our professionals.

What is a conflict of interest?

A conflict of interest is when an action or business decision is influenced by the fact that Ferrer employees, or third parties with a personal connection to Ferrer employees, hold a personal stake in the outcome.

Examples of situations where a conflict of interest may arise or occur:

- Hiring a family member or friend, or an entity that they manage to carry out certain services.
- Hiring a family member or friend without reporting their relationship to a Ferrer employee.
- Holding a financial interest in competing companies, customers or suppliers of Ferrer.
- Using Ferrer’s workplace for business or career opportunities for your own benefit.

What do I need to do?

- Base your professional decisions exclusively on objective criteria and do not let yourself be influenced by personal interests or relationships.
- Do not enter into private agreements with business partners in order to obtain more favourable terms in your transactions with Ferrer.
- As far as possible, avoid situations that may involve a conflict between your personal interests and Ferrer’s, and refrain from making decisions in which you have a personal stake.
- Contact the Ethics & Compliance Department if you have any doubts.

Corruption and favourable treatment

Ferrer is guided by the principle of zero tolerance for corruption, which is why we reject any related practice.

We comply with all the applicable regulations and standards to the fight against corruption.

Our preventive approach to corruption is also developed outside the company.

At Ferrer, we are committed to doing business with third parties who share our standards.

What practices can be understood as acts of corruption or bribery?

- Guiding or influencing the actions of a certain job position, public official or authority by taking advantage of a personal relationship to obtain an economic advantage.
- Exercising lobbying practices for corrupt or illegal purposes, or to improperly influence a decision.
- Making contributions to political parties or non-profit organisations linked to them.
- Making donations or offering funding or sponsorship to social, cultural or scientific projects for corrupt or illegal purposes, or to unduly influence a decision.
- Giving or accepting gifts or benefits that go beyond politeness.
- Providing samples of our products in violation of legislation and Ferrer’s internal procedures.
- Making payments in order to ensure or accelerate a routine non-discretionary government action.

Corruption and favourable treatment



What do I need to do?

- Refrain from giving gifts that are not in line with the provisions of the applicable sectorial codes or that can be interpreted as the pursuit of an illegitimate purpose. Consider whether your reputation, the recipient’s reputation or Ferrer’s reputation may be affected.
- Before accepting gifts, make sure they do not constitute a red flag in Ferrer’s Anti-Corruption and Anti-Bribery Policy.
- Do not use travel or entertainment expenses to cover rewards for customers, suppliers, collaborators or healthcare professionals.
- Decline any request for or offer of improper payment and immediately notify the Ethics & Compliance Department.
- Do not give gifts to healthcare professionals, healthcare organisations, or patient organisations.
- Contact the Ethics & Compliance Department before accepting gifts from a business partner or offering gifts to them.
- Contact the Ethics & Compliance Department if you have any doubts.

Free competition

At Ferrer, we respect the principle of free market competition and comply with applicable legislation. We believe that fair competition, based on quality, price and service, is beneficial for consumers.

We promote a free, fair and trusted market. We do not engage in agreements or practices with our competitors that impede or limit free market competition.

We believe in equal opportunities and refuse to unlawfully access information from the market and our competitors.

At Ferrer, we are careful with the information we share with others. We avoid conversations outside the workplace related to product strategy, price, commercial conditions or other information of a confidential nature.

What do I need to do?

- Avoid prohibited behaviour, such as price fixing or agreements in tenders, splitting customers or markets between competitors, or, in some cases, agreements between competitors to refuse to deal with other competitors, customers or suppliers.
- Avoid conversations about confidential aspects of our products outside the workplace. The disclosure of confidential information is already in breach of competition law.
- Contact the Legal Department if you have any doubts.

Exports and international sanctions

We market our products virtually all over the world, either directly or through our trading partners, which means we carry out import and export activities.

At Ferrer, we comply with applicable legislation on customs and export controls in the countries in which we operate.

Under certain circumstances, the law prohibits or restricts doing business with certain countries, governments, entities and/or individuals. At Ferrer, we carry out due diligence on our business partners that allows us to evaluate whether they are subject to “international sanctions”.



What do I need to do?

- Obtain the necessary information to verify that no business relationships have been established with entities and/or individuals subject to international sanctions. Contact the Ethics & Compliance Department and start the Business Partner Due Diligence process.
- Make sure Ferrer has the authorisation or license to export a certain product and provides accurate and truthful information to the Customs Authorities.
- Contact the Ethics & Compliance Department if you have any doubts.

Taxation and financial integrity

The information and data we produce must be reliable. Therefore we keep an exact and timely record of all the transactions we carry out, making sure to store all the information correctly and accurately.

Ferrer guarantees and ensures the integrity of the company’s financial data and records, providing accurate and complete information.

At Ferrer, we are aware of our social responsibility to comply with the applicable tax and social security obligations in the countries in which we operate.

We comply with our tax obligations and work with tax authorities to put an end to any possible fraudulent practices.

What do I need to do?

- Provide all accounting and financial data in a clear and correct manner to the persons responsible for managing them.
- Contact the Tax, Legal or People Department if you have any doubts.



Money laundering

At Ferrer, we are aware that money laundering is a global problem and that our involvement in these activities can damage our reputation and expose us to severe sanctions.

Ferrer has procedures in place to assess and detect potential money laundering risks.

What is money laundering?

When money or any other asset that derives, either directly or indirectly, from a criminal activity is put back into circulation (even by a third party). It also encompasses any action to conceal the illicit origin of the money or assets, and any action to help the person who participated in the offence avoid the legal consequences of their criminal activity.



What do I need to do?

- Pay attention to unusual payments, taking into account any transactions and payments made to (or by) third parties that do not match the name of the person on the invoice, or the person mentioned in the signed contract.
- Complete the full approval process to register customers and suppliers, as well as the *Business Partner Due Diligence* process, where applicable.
- Notify any situation or transaction where there is evidence of money laundering.
- Contact the Credit Management Department if you have any doubts.

Shared Responsibility

Ferrer's commitment

At Ferrer, we strive to build strong relationships of trust with our employees.

Therefore, we consider it a shared responsibility of both Ferrer and our collaborators to make proper use of Ferrer's assets and tools, as well as to respect the intellectual and industrial property rights and the personal data and privacy of our employees and the individuals we work with.



Use of Ferrer assets and resources

At Ferrer, we provide our employees with the work tools necessary for them to properly carry out their duties.

We must all use them responsibly and in accordance with internal policies and regulations to ensure Ferrer’s IT assets and systems are protected, and in order to protect IT equipment from being used for illicit purposes, and from misuse and access, damage, deterioration, theft and loss.

What are illicit purposes?

Illicit purposes include illegal downloads and storing or sending obscene, violent, intimidating or harassing material.

What do I need to do?

- Make proper use of the work tools Ferrer provides you.
- In case of damage, theft, loss or unauthorised access to any work tool provided by Ferrer, or unauthorised access to confidential information, business secrets or personal data, immediately notify the IT department.
- Contact the Legal Department or IT if you have any doubts.

Industrial and intellectual property

At Ferrer, we discover, develop and manufacture innovative products, and industrial and intellectual property is a valuable asset for the company. It's everyone's responsibility to protect it.

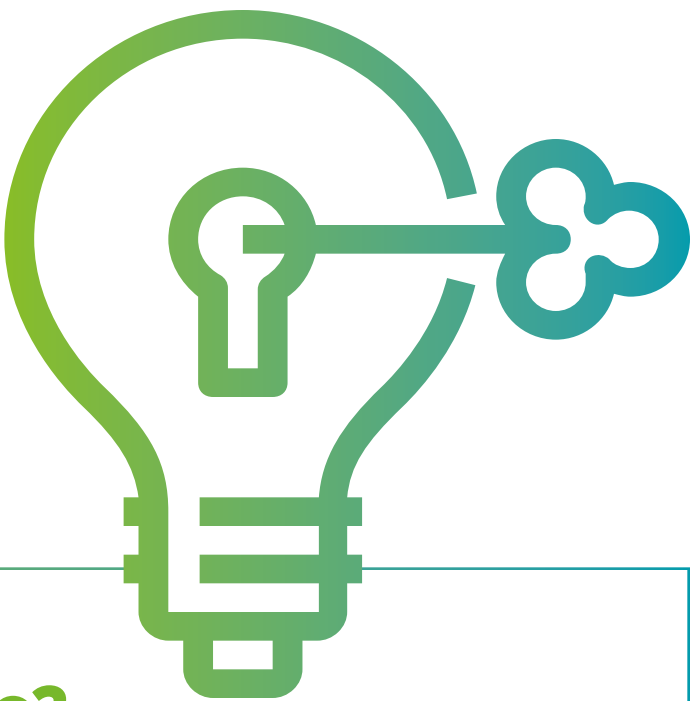
We also respect the intellectual and industrial property rights of our business partners and third parties, and do not make use of protected inventions without express permission.

We ensure that the intellectual and industrial property rights of third parties are not infringed when preparing materials of any kind.

What is protected by regulations?

Intellectual property protects artistic and scientific works (articles, papers, posters, promotional material, etc.) and computer programs.

Industrial property includes trademarks, designs, business secrecy and patents. and patents. Inventions can be protected or supported by patents. Pharmaceutical formulations, medical uses, industrial processes and specific methodologies are examples of inventions.



What do I need to do?

- Do not use materials that are protected by intellectual property rights without appropriate permission.
- Confirm that the products developed by Ferrer or that Ferrer intends to market do not infringe on the industrial property rights of third parties. Do not disclose any possible inventions that could be protected by patents or business secrecy.
- Contact the Legal Department or Patent Department if you have any doubts.

Confidential information and business secrets

At Ferrer, we handle confidential information and business secrets carefully, ensuring that the only people who have access to the information are the people who need it for their job, and making sure they make responsible use of the information.

We have the appropriate data protection and security measures in place to safeguard confidential information and business secrets, stored on any format, against any risk, accident or tampering, including access controls and device encryption.

What do we mean by business secrets at Ferrer?

A business secret is any type of information or knowledge that has a real or potential value and that we do not want the competition to find out. As a result, this information is kept secret.

What do I need to do?

- Be sure to properly identify and manage any confidential information you handle, and share it only with those with authorisation or who need access to it.
- Comply with protective measures to keep information confidential and safeguard business secrets.
- Do not share or make use of any confidential information you may have obtained from your employment relationships with other companies.
- Contact the Legal Department if you have any doubts.

Data protection and privacy

At Ferrer, we process personal data, including particularly sensitive data such as health data, while always ensuring compliance with applicable legal regulations and respect for the privacy of our employees and the individuals we interact with, including healthcare professionals, customers, patient suppliers and other related third parties.

We only gather the personal data that is strictly necessary to carry out our activity. We ensure that data is stored securely and that only people who need to access their data for their job position have access to it.



What do I need to do?

- Do not share your password for accessing Ferrer systems.
- Make sure to take the obligations related to the protection of personal data into account in your professional activity.
- Restrict personal data processing for colleagues or third parties to the activity or task you are performing and avoid sharing data if it is not strictly necessary.
- Contact the Legal Department or IT if you have any doubts.

Contact us

If in doubt, ask first and act later

We encourage all our professionals to express their doubts or concerns.

If you have any questions regarding the Ethical Code or other regulations that apply to Ferrer, please contact the Ethics & Compliance Department personally or by email at: compliance@ferrer.com

Ethics & Compliance will redirect inquiries that fall within the remit of other departments.

Ask us!

We're here to help.



Speak up!



If you know of or suspect any improper behaviour, or become aware of a situation that goes against Ferrer's Ethical Codes, regulations or ethical values, **please report it:**

- Via the Form you can find on the Ferrer corporate website and on Tag:

WWW

TAG
- By sending an email to ethicalchannel@ferrer.com
- By email or in person, by contacting the Complaints Office at the Ethics & Compliance Department. Ed. L'Illa, Avda. Diagonal 549, 08029, Barcelona.

Ferrer's Corporate Whistleblowing Management System complies with the rights and guarantees of the parties involved, preserving guarantees of proportionality, non-retaliation, presumption of innocence and privacy, among other rights.



Grupo Ferrer Internacional, S.A.
April 2021