



Ethics & Compliance at Ferrer

Ethics & Compliance





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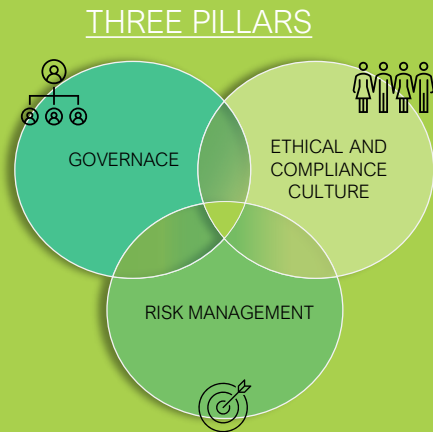
01 | Ferrer's Ethics & Compliance Model

“Doing the right thing, even when no one is watching. Beyond mere compliance.”

Ferrer has the firm conviction that **ethics and compliance** are essential to develop its purpose of making a positive impact on society.

Ferrer counts with an **Ethics and Compliance Model**, which encompasses the corporate system of ethics and organization, prevention, management and control of Ferrer's compliance risks, including those of criminal and sectorial nature to which it is exposed due to its activity. This Model is aligned with the provisions of the regulations on **criminal liability of legal persons** and other legislation and industry regulations and is configured as a key element to develop Ferrer's commitments to integrity set out in the Ethical Code.

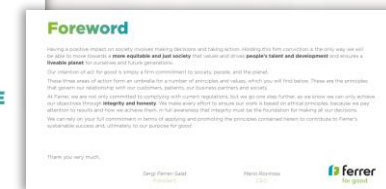
MODEL



PRINCIPLES

- Ethics
- Compliance
- Transparency
- Integrity
- Honesty

This document includes the essential elements of the Model. All Ferrer People shall make the necessary efforts to comply with and promote internally and externally compliance with the **principles** that govern all our **decision making**, in relation to the **3 pillars of the Model**.



02 | Ethics & Compliance function

Three-lines Model

Ferrer relies on the **Three Lines of Defence** model, adopting a decentralized model that allows for a **specific assignment of responsibilities** and guarantees maximum coordination of the different areas and bodies involved and their continuous improvement.

Risk Management		Assistance, supervision, monitoring, continuous improvement and reporting of the E&C Model		Support	Validation
Ferrer's functional areas and business units	Management Committee	Función de ética y compliance (Ethics & Compliance Corporativo y Local)		E&C Corporate E&C Committee (decision on ethical complaints)	Legal
1st line		2nd line			3rd line
				Internal Audit	

The function

The **Ethics & Compliance function** acts as a second line of defence and is responsible for overseeing the correct implementation of the Model and its continuous improvement. Its **main functions** are:

-  To set and **ensure continuous improvement** of the Model.
-  To **assist and support the first line** in the risk management process and other compliance issues.
-  To **promote a culture** of ethics and compliance
-  To provide **the methodology and tools necessary** for the correct management of the Model.
-  To provide **access to resources and means, training** and awareness-raising activities.
-  To act as the **responsible body** and receive and manage **communications and complaints** from the Ethical Channel.



03 | Elements of the Model

Human and financial resources management

Ferrer provides **sufficient** financial and human resources **necessary** for the proper functioning and continuous improvement of the Ethics and Compliance Model.

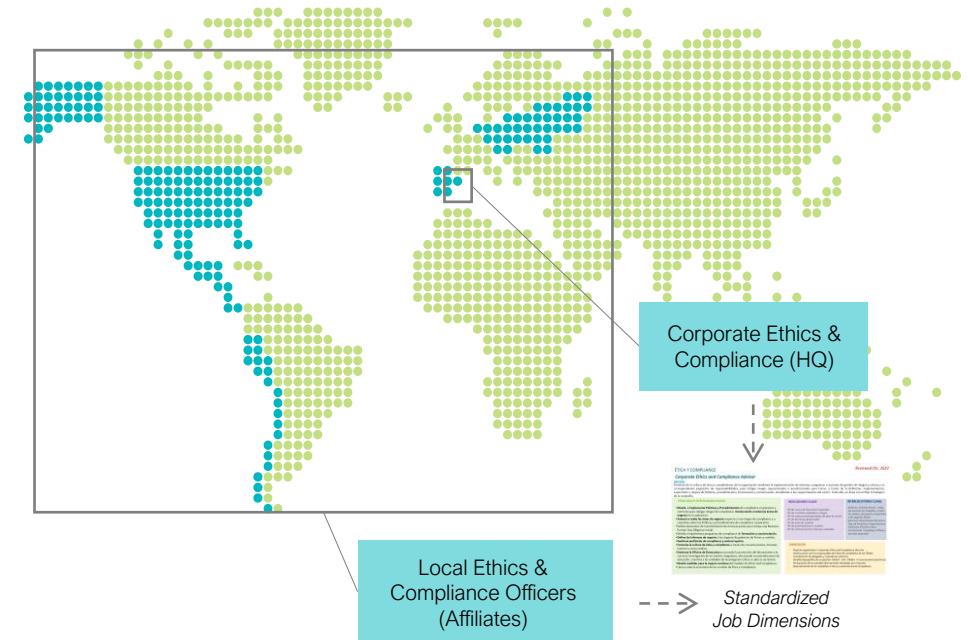
Ferrer places special emphasis on corporate the collaboration between the corporate team and its subsidiaries. Thus, the **Corporate Ethics & Compliance** team coordinates with the **Local Ethics & Compliance Officers** in Ferrer's subsidiaries to jointly manage the ethics and compliance aspects that affect Ferrer. All *Job Dimensions* are standardized.

Operating procedures and internal regulations

Ferrer reinforces its ethical performance through the **development and updating of policies and procedures**, being the **Ethical Code** and the **Ethical Code for Third Parties** the fundamental rules that set the values and ethical principles of the organization.

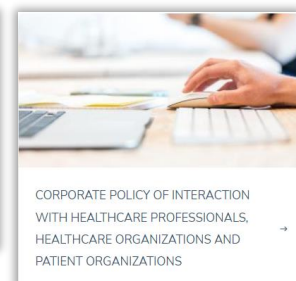


Ethics & Compliance develops, reviews and periodically updates the **corporate compliance** and **healthcare compliance** policies, which are available on **TAG (Ferrer's Intranet)**. Those of external scope are also included in Ferrer's website.



- Ferrer for good
- Ethics and compliance
- Transparency
- Management team
- Our history

We are Ferrer Great People Liveable Planet Social Justice

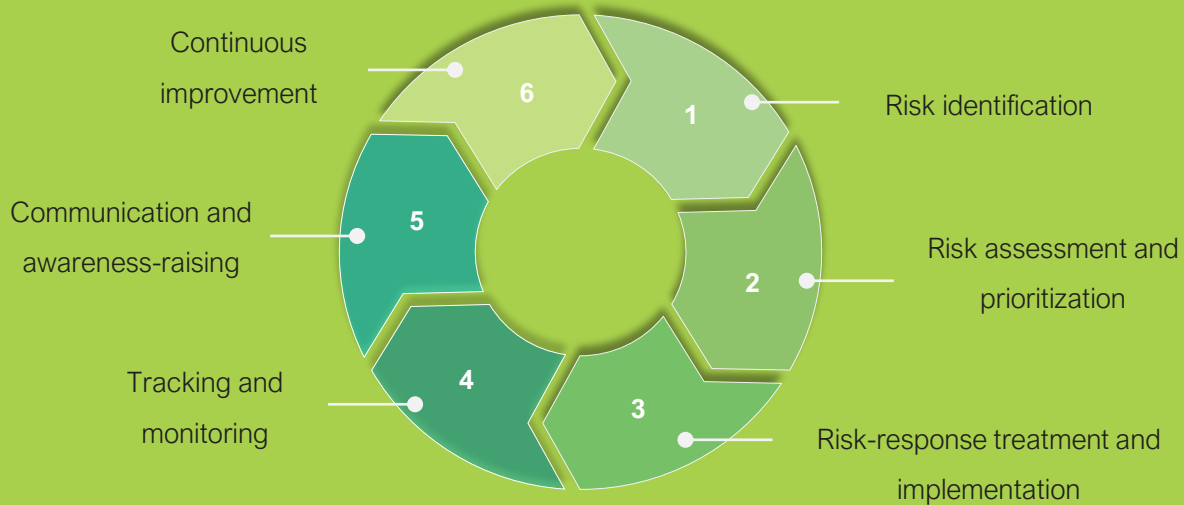


04 | Risk identification and management

Regulatory Risk Management System

Ferrer disposes of management models to identify activities in which legal or compliance violations may be committed, in accordance with the provisions of criminal law. In this sense, Ferrer uses **digital tools** that allow the **management and monitoring of legal and compliance risks** and assist in the implementation and **continuous improvement** of the Ethics and Compliance Model in its entirety.

Ferrer's system is divided in six stages that allow the management of its risks in a **logical and structured manner**, enabling **effective and efficient decision making**.



05 | Ethical Channel and disciplinary system









“Speak Up” culture at Ferrer

All Ferrer People undertake their obligation to report through the **Ethical Channel** any **irregularities or suspect of irregularities** of which they become aware that may be contrary to the provisions of Ferrer’s Ethical Code, internal regulations and/or the current legislation.

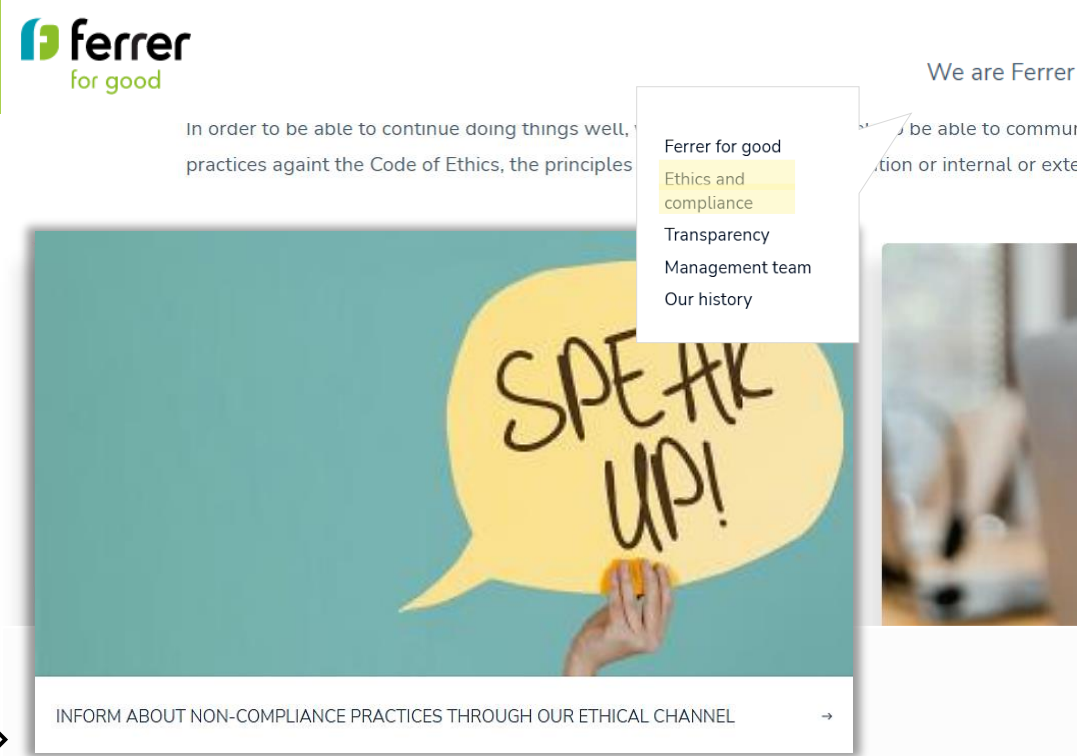
The Ethical Channel is the main way to report such situations and its responsible is the Corporate Ethics & Compliance Director. It is **open to all Ferrer People and Third Parties**, through a **Form** that is available on **Ferrer’s corporate website**.

Rights and guarantees of the Ethical Channel and procedure

The Ethical Channel **ensures**, in all cases, the **rights and guarantees of whistleblowers and defendants**, in accordance with the provisions of the legislation in force.

Rights of the whistleblower	Rights of the defendant
Confidentiality and information security 	Confidentiality and information security 
Right to be informed 	Right to be informed 
Anonymity 	Presumption of innocence and right to testify 
Non-retaliation (good faith whistleblowers) 	Right to fair proceedings and proportionate measures 

In the event of non-compliance, Ferrer will act in accordance with the provisions of its **internal regulations and disciplinary system** and, in all cases, in compliance with the provisions of the laws and agreements in force.



06 | Training, awareness-raising and communications

Ferrer's commitment and "Tone from the top"

For the Ethics and Compliance Model to be effective, it must be disseminated. This requires the **commitment of all Ferrer People**, especially of its **leaders**. A **Statement of Commitment** is signed annually.

Training, awareness-raising and communications

Ethics & Compliance carries out **internal and external** training, communication and awareness-raising activities for Third Parties with whom it interacts. The purpose is to establish a framework of ethics and compliance in its professional relationship with them, allowing **awareness and continuous improvement** of the Model.

Mandatory training

of the Ethical Code and Other relevant regulations of Ferrer's Model to all Ferrer People.



Specific training

on ethics and compliance topics according to profile, on a regular basis.



Third-party training

(Business Partners and Third Parties, depending on their relationship with Ferrer) on ethics and compliance topics.



Continuous awareness of Ethics and compliance topics

In case of any queries or concerns, Ferrer People may contact compliance@ferrer.com or the Local persons of contact.



Compulsory training



COMPULSORY TRAINING

Take away learning market

Explore the training offer of skills in Ferrer



EXPLORE

Do you speak Ferrer?

ferrer for good

FORMULAR tu futuro tiene premio

FORMULA

Be Agile Discover all the ways to be agile

07 | Continuous improvement: supervision, verification and monitoring

Development and continuous improvement vision. Reporting.

For the continuous improvement of the Ethics and Compliance Model, Ferrer:



It **reviews and updates the compliance policies and procedures** related to the Model, in accordance with the legislation and regulations in force at any given time and/or when required by internal or external circumstances.



It **monitors and controls the design and effectiveness** of the measures implemented and identifies possible shortcomings or improvements.



Subjects the elements of the Model to **regular audits**.



Internal and external **Reporting**.





Ethics & Compliance