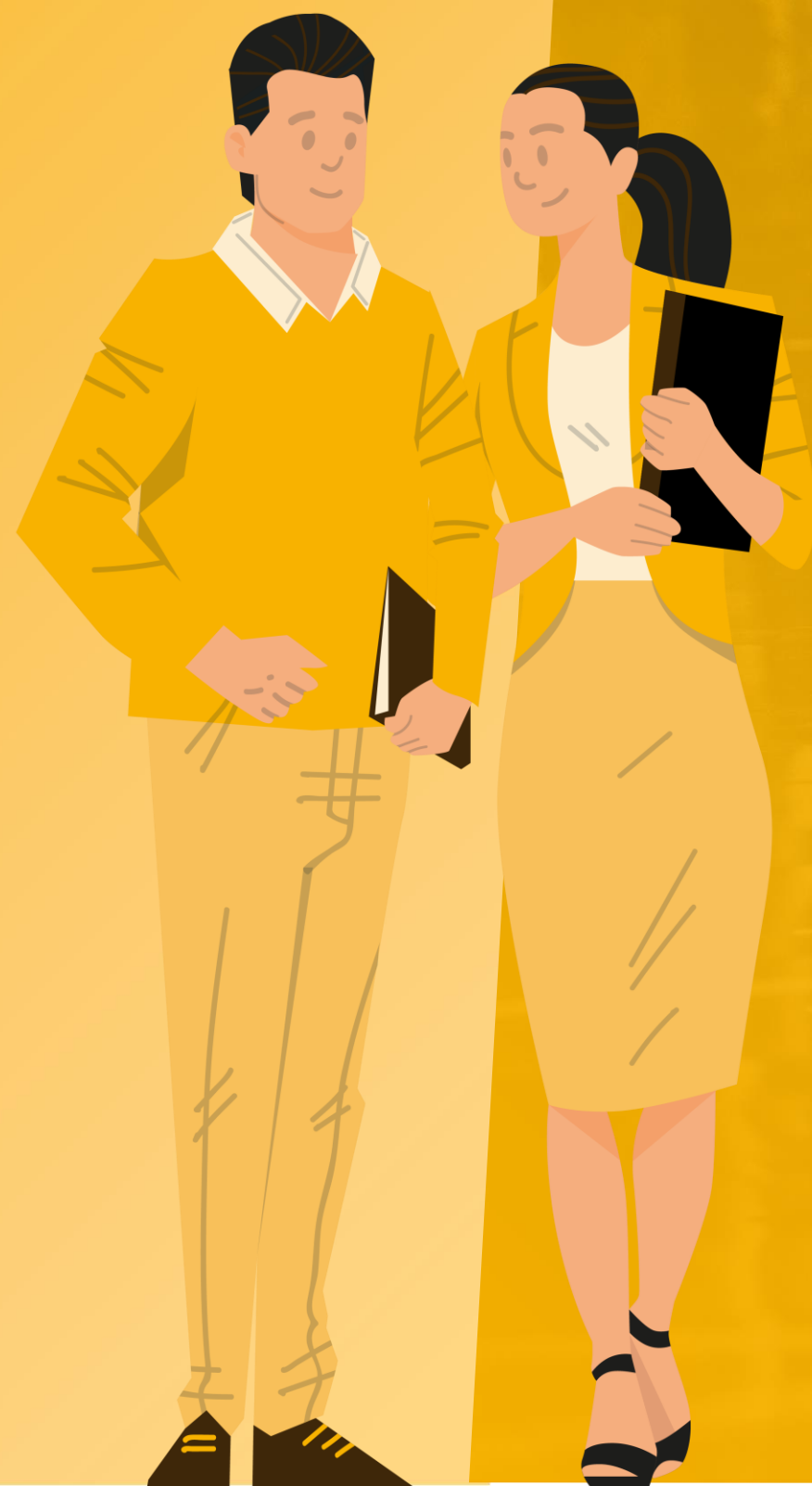


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Business Partner Due Diligence Policy



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01. Purpose

Ferrer firmly believes that ethics and compliance are essential factors in conducting its business. In order to do business in a global environment, Ferrer's transactions must cover and comply with the laws in force, in addition to with its Ethical Code and Ethical Code for Third Parties, and its Anti-Bribery and Anti-Corruption (ABAC), Trade Controls, Indirect Procurement and Prevention of Money Laundering and Financing Terrorism policies, amongst other internal rules.

In order to ensure that the practices of Ferrer's trading partners and suppliers (collectively, its "**Business Partners**") are likewise in line with its ethics and compliance standards by mitigating the risks of corruption, legal breaches and reputational damage, Ferrer reviews these Business Partners by way of **Due Diligence** processes.



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01. Purpose

A trading relationship will only be established with a new Business Partner or renewed with an existing one when the Ethics and Compliance Department signs off the Due Diligence, based on the internal standards agreed upon with all other departments involved in Due Diligence processes.

Therefore, the main purpose of this Corporate Business Partner Due Diligence Policy (hereinafter, also called the “**Policy**”) is to establish the subject matter of the Due Diligence process of Business Partners put in place by Ferrer, its scope of application, the main milestones in the process and the main responsibilities of the departments involved.

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02. Scope of application

2.1 Subjective and territorial scope

This Policy is directly enforceable on all People of the Ferrer companies listed below, jointly known as “**Ferrer**” for the purposes of this Policy and its implementing procedures.

- Grupo Ferrer Internacional S.A.
- Ferrer Internacional S.A.
- Ferrer Farma S.A.
- Interquim S.A.
- Noventure S.L.
- Ferrer Portugal S.A.
- Ferrer Chile S.A.
- Ferquim S.A.
- Ferrer Therapeutics S.A. de C.V. (Ferrer México)
- Ferrer Centroamérica y Caribe S.A.
- Ferrer Farma Perú S.A.

It will therefore govern the actions of all Ferrer People who work for any of the above entities whose functions include sourcing Business Partners, regardless of their hierarchical or functional position or territory (all known as "**Affected Persons**").

In the event any person of a Ferrer company not included on the above list have justified grounds for conducting a Due Diligence (e.g., on a potential strategic partner of Ferrer, of if there are suspicions or indications of unsuitable conduct by any member of the governing and control bodies of an associate partner, or concerns about its shareholders), that person may submit a request to the Ethics and Compliance department to start this review process.



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02. Scope of application

2.2 Objective scope

The Business Partner Due Diligence process (“BPDD”) is the method established by Ferrer for assessing entities with which it conducts business based on the following perspectives:

- a) From a **legal, ethics and compliance perspective**, through the **Ethics & Compliance (“E&C”¹)** department, to analyze corporate aspects and past records, incidents or news that may affect the reputation and/or prestige of the Business Partner, and to verify that it is not subject to international sanctions.
- b) From a **financial perspective**, through the **Customer Service & Credit Management (“CS&CM”) and/or Accounts Payable (“AP”)** departments, in order to identify potential risks non-compliance with money laundering and financial sustainability regulations; and
- c) From a **technical perspective**, through the **Pharmacovigilance (PV), Regulatory Affairs (RA) and Quality Assurance (QA)** departments, where pharmacovigilance, regulatory and quality criteria are taken into account, in order to ensure that the commercial partner meets the technical requirements and standards necessary to collaborate with Ferrer.

This structure will be replicated locally in international affiliates, in accordance with the provisions of the procedures that develops the contents of this Policy.

¹ For the purposes of this Policy and the Procedure that develops it, it shall include the corporate team and the local Compliance Officers appointed in each international subsidiary.

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02. Scope of application

2.2 Objective scope

Therefore, this Business Partner Due Diligence Policy and its implementing procedure will apply to the Due Diligence processes that must be conducted by the **Affected Persons** in respect of the categories listed in the document **“Typology of Business Partners subject to BPDD”** annexed to the Procedure, notwithstanding the application of any other procedures that may have been implemented by other departments.



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03. Conducting Business Partner Due Diligence

This Policy applies to new and existing Business Partners with which a new relationship is going to be established. This section includes essential information related to conducting Business Partner Due Diligence. Details on the process will be regulated by the Business Partner Due Diligence Procedure that develops this Policy.

As soon as a Requesting Unit (“RU”) becomes aware of a business opportunity or partnership with a new or existing Business Partner, a Due Diligence process must be conducted.

a) **First Due Diligence:**

This is conducted on a new or existing Business Partner with which Ferrer would like to start a new business relationship.

b) **Renewal de Due Diligence:**

This entails a review of Due Diligence status, according to the level of risk of the Business Partner analyzed (HIGH, MEDIUM or LOW).

c) **One-off Due Diligence:**

This is conducted in any cases in which Ferrer may have become aware of new information or in cases not specifically covered in this Policy, as well as in cases in which the nature of a transaction makes a Business Partner Due Diligence process necessary.

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03. Conducting Business Partner Due Diligence

Generally, the Due Diligence on Business Partners must have been completed **before entering into a business relationship with the Business Partner and beginning to work with it**, with the relevant approvals. If a previous contractual relationships with the Business Partner already exists, the Requesting Unit must complete the Business Partner Due Diligence process **when modifying the existing contract or creating a new one**.

The rules for the development of this Policy will establish the events in which, due to the type of Business Partner and/or the collaboration between the Business Partner and Ferrer, a contract may be signed, and the collaboration may begin without the express approval of any technical department², or with the conditional approval of any of them.

The Requesting Unit must reduce its contact with the Business Partner until the Due Diligence has been completed to what is strictly essential and necessary to prepare the draft agreement. The responsibility for selecting a Business Partner and initiating the BPDD process falls to the Requesting Unit responsible for the business relationship.

The Due Diligence process will be conducted using the IT tool sourced by Ferrer for this purpose. In addition, the questionnaires that supplement the implementing procedures must be used, in case it is necessary to ask a Business Partner for more information.

Once Due Diligence has been completed, the resulting risks will be monitored by way of an automated process by the Ethics and Compliance department using the IT tool based on the Business Partner's level of risk (HIGH, MEDIUM or LOW).

²This refers to the Corporate Pharmacovigilance (PV), Quality Assurance (QA) and Regulatory Affairs (RA) departments.

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04. Roles and responsibilities related to Business Partner Due Diligence

This Section includes detailed information of the bodies involved in the Business Partner Due Diligence process and their main responsibilities. Specifically, the actions to be taken by each unit involved in the review process for the procedures implemented through this Policy are as described below.

4.1 Requesting Unit (POCs and RUs)

A Requesting Unit refers to a specific unit of Ferrer that requests a partnership with a Business Partner.

Each Requesting Unit will have an account on the IT tool and a Person Of Contact (POC) who will be in charge of establishing the collaboration with the Business Partner, and who will liaise between E&C, CS&CM and/or AP departments, throughout the Business Partner Due Diligence process.

This POC will also be in charge of interacting with the PV, QA and RA departments, whenever required to do so.

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4.1 Requesting Unit (POCs and USs)

The **main responsibilities** of a Requesting Unit in relation to the Due Diligence process are as follows:

- a) To begin the Due Diligence process using the IT tool (setting up an *Assessment*) through a POC or, in the case of the review of Suppliers³, through the Procurement Department, as detailed in the development procedure of this Policy.
- b) To send a questionnaire to a Business Partner (when necessary) and to review it when returned completed and signed by the Business Partner in question, in order to ensure that it has been filled out in full and that the information provided is coherent with the partnership requested. Once this has been done, it must be submitted to the Ethics & Compliance department for review.
- c) Through the POC, to follow up the Assessment in the IT tool and, if necessary, to ask for information about the degree of progress made by the departments involved in the process.

³Support from the Procurement team applicable to Ferrer companies located in Spain.

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4.2 Ethics & Compliance Department

The Corporate Ethics & Compliance department (in HQ and Spain) and the Local Ethics & Compliance Officers (international affiliates) are responsible for the proper implementation of this policy, as well as for keeping it up to date.

Main functions:

- a) To oversee the whole process, acting as the axis of the transversal analysis and validating body of a Business Partner in the IT tool.
- b) To resolve any issues that may arise during the Due Diligence processes conducted by the Ethics & Compliance department using the IT tool and/or in relation to the Compliance questionnaires sent out by it, if applicable. For such purposes, queries can be addressed to compliance@ferrer.com or to the Local Ethics & Compliance contact at the respective international affiliate.

Any questions related to the reviews conducted by the Pharmacovigilance, Regulatory Affairs and Quality Assurance departments will be directly handled by the Requesting Unit and the contact persons of these departments.

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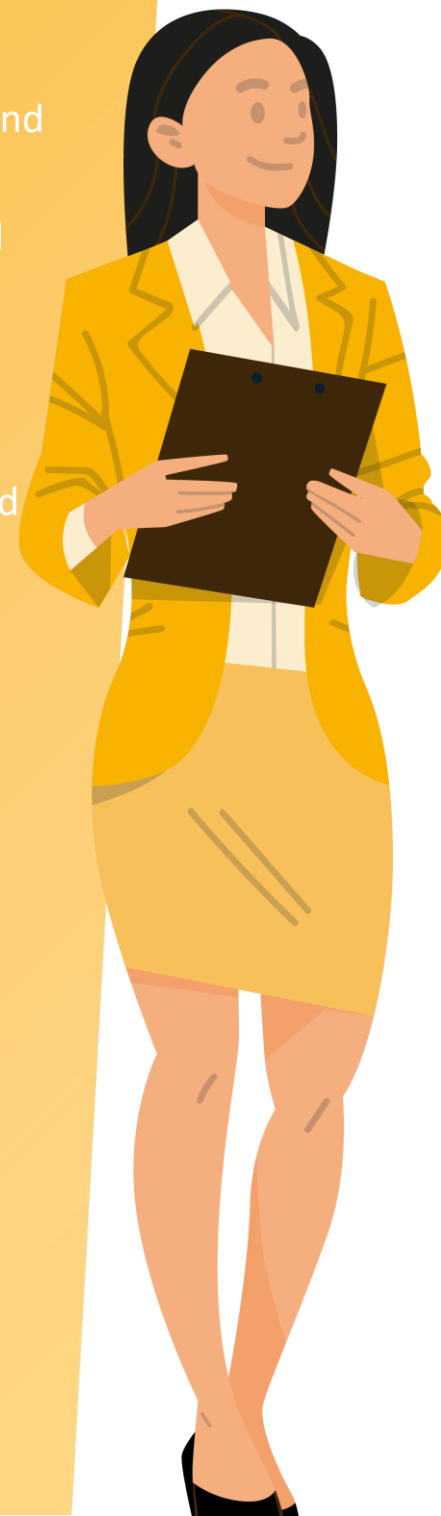
- c) To act as the final approval body of a Business Partner, once the overall review has been completed by the various departments involved and their conclusions added to the IT tool.
 - (i) If everything is correct, the Ethics & Compliance department will accept the Business Partner, including any additional measures or actions that may be taken, if applicable, as well as the degree of monitoring and review of the Business Partner during the contractual relationship with Ferrer.
 - (ii) In the event that the Ethics & Compliance department decides to reject a Business Partner, the Corporate Ethics & Compliance Director will communicate the decision in a reasoned manner to the Requesting Unit. If the latter does not agree with the decision adopted, the matter will be escalated to the CEO for a final decision.



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- d) It may offer acceptance of a Business Partner without the express approval or with the conditional approval of the technical departments (Pharmacovigilance, Quality Assurance and Regulatory Affairs), depending on the type of Business Partner and/or actions detailed in the regulations that develop this Policy⁴.
- e) Whenever necessary, the E&C department will review the content of the Compliance questionnaires sent out, as well as any additional documentation provided. The Requesting Unit will be responsible for checking that the questionnaire has been properly filled in and signed by any given Business Partner before submitting it to the Ethics & Compliance department.

⁴See the Corporate Business Partner Due Diligence Procedure for more information on the approval process.

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4.3 Credit Management and Accounts Payable Departments

The Customer Service & Credit Management (CS&CM) and Accounts Payable (AP) departments are responsible for conducting the analysis of the Business Partner's compliance with money laundering regulations and financial sustainability of the operation/business relationship.

Particularly, the CS&CM department will be in charge of the review of Business Partners that may be considered as Ferrer clients, and the Accounts Payable department, of Suppliers.

Insofar as the Due Diligence process is concerned, it has been assigned the **following functions:**

- a) To review the financial information provided by Business Partners (in cases in which the risk flagged up by the IT tool and validated by the Ethics & Compliance department is MEDIUM or HIGH) and to approve and/or make comments on the IT Tool.



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4.4 Pharmacovigilance, Quality Assurance and Regulatory Affairs Departments

The Pharmacovigilance, Quality Assurance and Regulatory Affairs departments play an essential role in the Business Partner Due Diligence process, as they conduct their own reviews from a technical perspective based, in any event, on the type of Business Partner and/or type of service or partnership with Ferrer.

Their **main functions** in the process are:

- a) Evaluate the information provided by the Requesting Unit in the IT Tool in order to determine the need or not to perform specific assessments (DDs) from a technical perspective, according to the type of Business Partner and/or service/collaboration.

In the event that the review is not applicable and in the event that technical Due Diligences are required, the three departments will indicate this in the IT Tool.

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4.4 Pharmacovigilance, Quality Assurance and Regulatory Affairs Departments

- b) When applicable, to perform the appropriate technical evaluations in accordance with the Pharmacovigilance, Quality Assurance & Regulatory Affairs (PV/QA/RA) Technical Due Diligences Procedure and/or corresponding procedures and manage directly with the Requesting Unit the progress of these evaluations.
- c) Keep the Requesting Unit and the Ethics & Compliance department informed about possible incidents in the evaluations that may slow down the acceptance of the Assessment.

The **Pharmacovigilance, Quality Assurance & Regulatory Affairs (PV/QA/RA) Technical Due Diligences Procedure** developed by the Quality Assurance, Regulatory Affairs & Pharmacovigilance area will include the most operational aspects related to the above functions.

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4.5 Procurement Department

The Procurement Department is responsible for the approval of Ferrer's Suppliers as described in the Indirect Procurement Policy. Regarding the Business Partner Due Diligence process, it plays an essential role in the approval of Suppliers, namely:

- (i) In Spain, it acts as a support unit to the Requesting Units when a Business Partner is a Supplier.
- (ii) As provided for in the policies and/or procedures that apply at any given time, it is jointly responsible with the Ethics and Compliance Department for defining and updating the types of Suppliers that must go through the Due Diligence process, in line with criteria such as the risk of the service provided, the jurisdiction, the amount involved in a transaction, the annual service volume, etc.
- (iii) The Corporate Procurement and Ethics & Compliance departments will be coordinated to guarantee the supplier's due diligence in accordance with this procedure or with the procedure promoted by Procurement, as appropriate.

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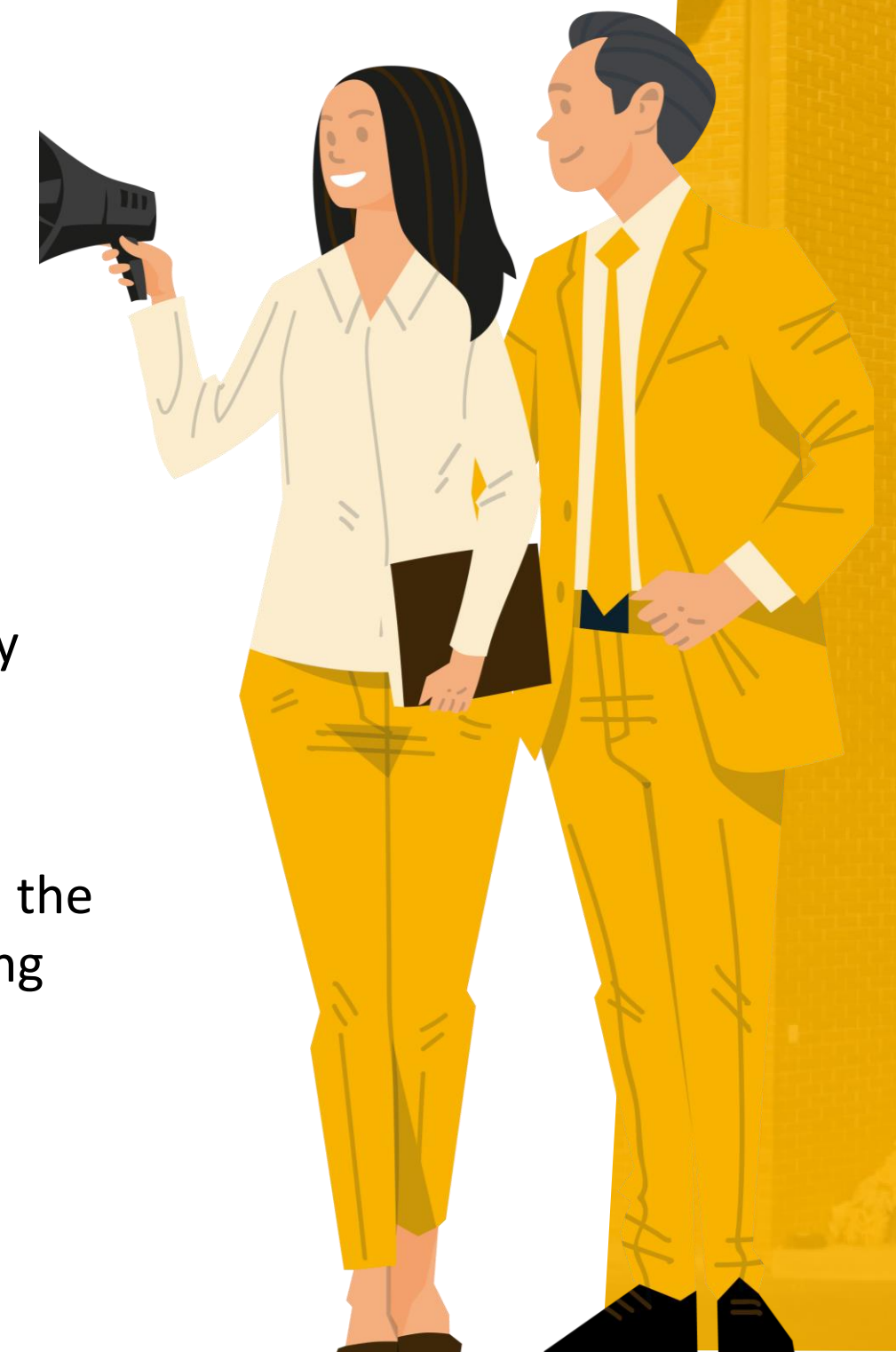
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4.6 CEO and Senior Management

In general terms, the CEO of Ferrer must adopt a final decision in writing regarding the collaboration with the Business Partner under analysis, in the event that the Corporate Director of Ethics & Compliance has communicated to him/her (reasoned) rejection of the contract and the head of the Requesting Unit does not agree with this decision.

- (i) If the CEO formally approves the Business Partner, the Corporate Ethics & Compliance Director will communicate this to the Requesting Unit and will accept the Business Partner in the IT Tool, attaching the email stating his duly motivated decision as evidence.
- (ii) On the other hand, if the CEO confirms the rejection of the Business Partner, the Corporate Ethics & Compliance Director will communicate it to the Requesting Unit and will attach the evidence of the rejection in the IT Tool.



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05. Continuous improvement: approval, review and disclosure

This Policy is subject to continuous review and improvement, particularly when so required. In any event, this Policy will be reviewed on an annually on an ordinary basis and, if required, will be duly updated. Failure to comply with this Policy may lead to disciplinary measures.

This Policy has been reviewed on 13th December 2022 and is available to all Ferrer People through the usual internal channel.

Chief Legal Officer

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Control of versions

Version	Changes	Effective date
1.0	Original version	26th October 2020
2.0	Second version	26th July 2021
3.0	Third version	1st December 2021
4.0	Fourth version	14 th December 2022

Departments / governing bodies involved

	Department / GB	Entity	Date
Prepared by	Corporate Ethics & Compliance Dept.	Grupo Ferrer Internacional, S.A.	23 th November 2021
Validated by	Chief Legal Officer	Grupo Ferrer Internacional, S.A.	14 th December 2022

Relevant information

Scope of application	<ul style="list-style-type: none"> - Grupo Ferrer Internacional S.A. - Ferrer Internacional, S.A. - Ferrer Farma, S.A. - Interquim, S.A. 	<ul style="list-style-type: none"> - Noventure S.L. - Ferrer Portugal, S.A. - Ferrer Therapeutics, S.A. de C.V. (Ferrer México) - Ferrer Centroamérica y Caribe S.A. 	<ul style="list-style-type: none"> - Ferrer Chile S.A. - Ferquim S.A. - Ferrer Farma Perú S.A.
Related regulations		<ul style="list-style-type: none"> - Code of Ethics - Code of Ethics for Third Parties - Trade Controls & Trade Sanctions Corporate Policy - Corporate Policy on Anti-money Laundering and Countering the Financing of Terrorism - Indirect Procurement Policy - Business Partner Due Diligence Procedure - Technical Due Diligence Procedure (PV/QA/RA) 	
Main body responsible for enforcement and monitoring		Corporate Ethics & Compliance	

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6. Annex

Terms and Definitions

For the purposes of this document and its implementing procedures, the following terms are used:

Business Partner

Any external party with which Ferrer has or plans to establish a business relationship. For the purposes of this Policy, the Business Partners are described in the “Objective scope” section above.

Agreement:

An instrument entered into between Ferrer and a Business Partner in which the undertakings of the business relationship are set out.

CEO:

Chief Executive Officer.

Assessment:

A request for the review of a Business Partner included in the IT tool. Each Assessment relates to one Business Partner.

Requesting Unit (RU):

A specific unit of Ferrer that requests a partnership with a Business Partner.

Due Diligence:

An investigation conducted of an entity or individual before entering into a potential business relationship.

Business Partner Due Diligence IT tool:

An IT tool enlisted by Ferrer for conducting the Due Diligence of Business Partners.

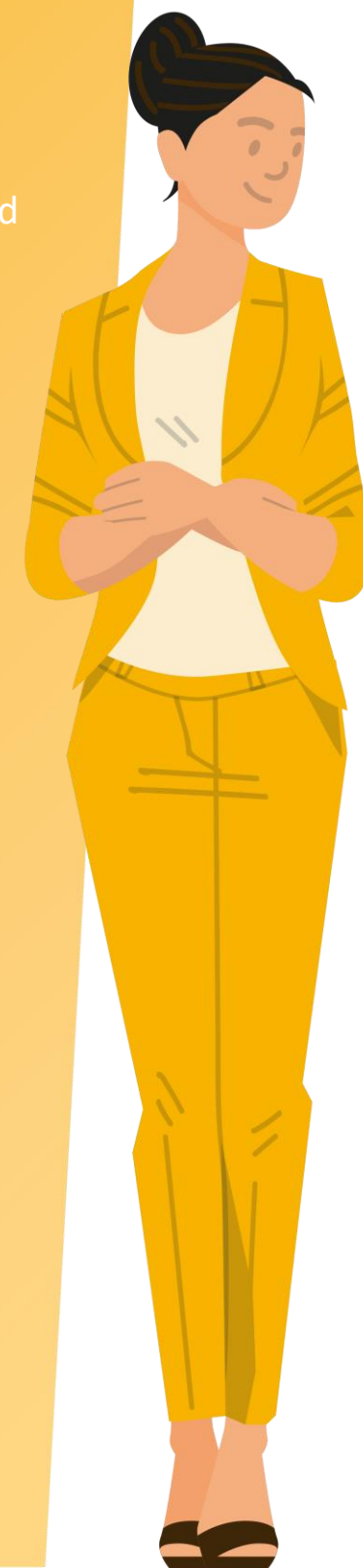
Related Rules:

Ferrer’s internal rules related to or implemented in this Policy that are listed in the section “Relevant information” above.

Corporate Ethics & Compliance

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Annex

Terms and Definitions

Affected Persons:

All of the senior management and employees of the companies listed in the section “Subjective and territorial scope” of this document.

POC:

The person of contact in each Requesting Unit responsible for handling and monitoring the IT tool for the Assessments conducted.

Red Flag:

Clues / evidences on a breach, event or circumstance of a potential breach, or a likely risk of a breach of the Policy or the related rules, or of any laws in force or in relation to the people affected or a Business Partner.

Partners:

Any Business Partner subject to Due Diligence under the terms provided for in the Policy with which Ferrer has established a business relationship or partnership that does not fall in the category of “Suppliers”.

Suppliers:

For the purposes of this Policy, the Business Partners subject to Due Diligence that supply materials and/or products or that provide a service to Ferrer for which they receive financial payment, under the terms established by Ferrer’s Procurement Department at any given time.

Legal, IP & Compliance

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