

Code of Ethics

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1º Introduction

The Juste Group, committed to the principles of transparency, legality and integrity, has approved this Code of Ethics, which was elaborated with a vocation of global compliance in all normative aspects that may affect the group's activity and with the firm decision to establish ethical cans that are respected by all the people who are part of it.

This Code of Ethics encompasses the general lines of the Culture of Compliance which, from the Governing Body, is transmitted to all the staff of the Juste Group and serves to strengthen the commitment to the ethics and social responsibility of the Group. This commitment goes beyond mere compliance with current regulations and establishes high ethical standards that must serve as a guide to action to all the staff of the Juste Group.

The Board of Directors of JUSTESA IMAGEN S.A.U, JUSTE S.A. QUÍMICO FARMACEÚTICA, JUSTE FARMA S.L.U. and CENINTER S.L. (“The Juste Group”) has approved the present code as its own document setting out the basic principles of conduct and ethical standards that must be observed by all individuals.

The Code of Good Practices for the Pharmaceutical Industry and the present *Code of Ethics* are mutually complementary documents. Therefore, both of them must be known and complied with by all persons belonging to the Juste Group

The Code of Ethics is a mandatory action guide setting out the basic ethical principles required to ensure that all conduct in the performance of professional activities conforms to the principles of lawfulness, integrity, and transparency in accordance with the traditional values of our company.

2º Scope of Application

The present Code of Ethics has been approved by the Juste Group’s Governing Body, and all its members including its administrators, management, employees and external consultants (“the Persons”) are required to comply with its stipulations. All of them are required to observe the principles set out herein and comply with the internal procedures for the best operation of the company.

3º Knowledge and Compliance

All the Persons are bound by the Code of Ethics, which will be provided or made available to them so that they can gain knowledge of it and raise any issues arising from their interpretation.

The Code of Ethics, despite being a very complete document, cannot foresee all the casuistics that the people of the Juste Group can face in their daily work. They must make the decisions most in line with their professional exercise and ethical commitment. Therefore, in situations where a conflict not resolved by the Code might arise, these

simple questions can be used to determine whether the decision taken is appropriate. In these situations, the following should be considered:

- ✓ Is it legal?
- ✓ If it were, does it comply with the Group's policies and procedures?
- ✓ If it complies with both, is it right to act that way?
- ✓ And as a complement to the above question, can action be explained without being perceived by third parties as misconduct?

If situations of regulatory, ethical, or moral conflict arise, the persons of the Group should elevate their consultations to the Compliance Officer, as the body responsible for resolving such conflicts and controversial situations.

Compliance with the Code of Ethics is mandatory for the Persons, who shall observe it in the performance of their professional duties. Any person becoming aware that any of the principles or rules set out in the Code of Ethics is contradictory or inconsistent shall report it to the Supervisory and Control Body, which shall review it and, as and when required, propose the amendments it deems appropriate to the Governing Body.

4º Fundamental Principles and Values

4º.1 Compliance with the Applicable Legislation

The Persons shall observe and comply with the legislation applying to their sphere of professional activity. In particular, in view of the special regulatory provisions applying to the industry, they shall ensure full compliance with all legislation regarding the distribution of medicines, healthcare products, cosmetics and food supplements.

4º. 2 Integrity and Transparency

The nature of the specific activity carried out by the Juste Group with its clients requires that the professional conduct of the Persons should at all times be marked by honesty, clarity and transparency.

This commitment covers integrity and transparency in the commercial and financial management. To comply with this, internal policies and procedures are in place to ensure compliance with regulations and good business and financial practices. This internal regulation ensures the proper training of the persons in charge of this type of management, the supervision of managers and the internal control systems that periodically check the proper compliance.

4º.3 Respect, Dignity, Non-discrimination and Gender Equality

The conduct of the Persons belonging to the Juste Group shall be marked by respect for their co-workers and others, and any form of disrespect or hostility towards others within

the context of a professional relationship shall not be allowed or consented under any circumstances.

The dignity of individuals and the absence of personal and professional discrimination constitute two basic principles which shall govern the conduct of all Persons.

The principle of gender equality, and of all differences that may affect (age, religion, capacities,...) will be respected in all areas of the Group, promoting equal treatment between men and women (and religions, ages, capacities...) with regard to access to employment, training, promotion of professionals and working conditions.

The basis of this principle is based on mutual respect among all persons, omitting distinctive biases based on race, religion, ethnicity, nationality, sexual orientation, disability, or any other reason contrary to current legislation. The Juste Group strives to have a diverse team and is committed to maintaining a safe and professional work environment, where talent and diversity of contributions will be valued.

The Group has a Protocol for the *Prevention and Procedure for the Treatment of Harassment at Work* that is the result of concern and commitment to prevent, avoid, resolve and punish cases of sexual or workplace harassment that may occur, as an essential requirement to ensure the dignity, integrity and equal treatment and opportunities of all persons in the organization.

Under that Protocol, the company management undertakes to investigate all allegations of harassment, establishing a procedure for resolving such disputes. This procedure, drafted in accordance with the recommendations contained in the European Framework Agreement on Harassment and Violence at Work signed on 26 April 2007, guarantees the right to privacy and confidentiality of the issues dealt with and of the persons involved.

The Juste Group will not consent, from whomever it comes, to any action that may involve physical violence or psychological or social coercion. All persons in the Group have the right to invoke these proceedings with the guarantee of not being subjected to intimidation, unfair, discriminatory or unfavourable treatment. Such protection shall extend to all persons involved therein.

Conduct constituting labour or sexual harassment shall be regarded as a very serious misconduct, which shall be punished, depending on the seriousness of the facts, with suspension of employment and salary, transfer, or disciplinary dismissal, without prejudice to giving transfer to the relevant authority in accordance with the circumstances of the case.

4º. 4 Responsibility with the pharmaceutical and chemical sector

The Juste Group has an important tradition in the pharmaceutical sector and during all these years have presided over its actions the principles of honesty, transparency and integrity. Its commitment extends to the frontal rejection of any type of trade policy that

is contrary to free competition and could be detrimental to the market, as well as behaviours to collect medical devices that could lead to market shortages and artificial price disruption. The main asset of the Juste Group are its professionals and the quality of its products, which are marketed safely and with the honesty of a traditional operator in the market, rejecting aggressive sales policies or any type of action that could be identified with anti-competitive practices.

4º.5 Respect for the environment

The Juste Group is fully committed to respect the environment and from the beginning of its action it was committed to preventing its industrial activity from harming it. For its protection, the highest quality standards have been implemented that are regularly monitored by the Group's staff and audited by externals to ensure an adequate and safe environment.

5º Standards of Conduct

5º.1 Protection of Privacy and Personal Data

The Persons belonging to the Juste Group are under the obligation of respecting the personal and family privacy of all individuals, including both employees and any other individuals to whose data they may have access in the course of their professional activity. The use of data shall follow the established general channels, in accordance with the general principles of use and in compliance with internal procedures. Compliance with any procedures and manuals regarding the data protection legislation and regulations is mandatory for all the Persons belonging to the Juste Group to which such legislation and regulations apply.

5º.2 Confidentiality

People belonging to the Juste Group must keep unpublished information and documentation of the companies that make up the Group strictly confidential, not solely to safeguard the obligations laid down in the legislation on Protection of Personal Data, but also the Group's commercial, financial and industrial interests.

Non-public data held by Grupo Juste about customers, suppliers, employees or third parties are confidential and must be processed in compliance with the contractual confidentiality agreements to which they are subject, and in any case, in accordance with the protection regulation data or business secret in what is applicable. Persons who handle such documents, information or data are responsible for granting them appropriate custody and use.

In accordance with Article 1 of Law 1/2019 of 20 February on Business Secrets, any information or knowledge, including technological, scientific, industrial, commercial, organizational or financial, which meets the following conditions, shall be considered a business secret:

- a) To be secret, in the sense that, as a whole or in the precise configuration and assembly of its components, it is not generally known to persons belonging to or easily accessible to the circles in which the type of information or knowledge in question is normally used;
- b) have business value, whether real or potential, precisely because it is secret, and,
- c) have been the subject of reasonable measures by its holder to keep it a secret.

Information and documentation of the Juste Group that is not public is considered a qualified asset as a business secret, without being allowed to be appropriated by the members of the Group for a purpose other than that for which it has been allowed access.

The duty of confidentiality of the one who has had access to personal data and/or confidential or secret information, will remain even when the employment relationship is terminated.

5°. 3 Standards of Conduct in the workplace

The Juste Group will not allow the use of drugs, psychotropic substances, stimulants, or alcohol in the workplace. This includes an express prohibition on joining the workplace of any person under the influence of such substances since it may generate a risk to himself or to a third party. In such cases, the person under the influence of any of these substances must leave the Group's premises and the Human Resources Directorate will be notified.

The consumption of tobacco is prohibited in the Group's facilities.

The ethical commitment to be undertaken by all members of the Juste Group includes the obligation to act in accordance with legality and not to carry out any type of illegal activity that could constitute a crime, and which could affect the property, possession, heritage, privacy, physical or moral integrity, dignity, freedom and self-image of a third party.

5°.4. Conflict of interest

Situations where there is a conflict of interest should be avoided. If the dispute arises during a commercial, business or professional operation, it must be communicated to the Compliance Officer.

There will be a conflict of interest in situations where the personal interest of the professional, or of a person linked to him, conflicts with any of the Group's companies.

The following persons will be considered as persons linked to the professional: :

- The professional's spouse or the person to whom they are linked by a similar emotional relationship, even without coexistence
- Brothers, brothers-in-law, ancestors or descendants of the professional or spouse, or person linked to him with a similar relationship of affectivity, even without coexistence

- Companies in which the professional, or person linked to him, by himself or per person brought, holds a supervisory situation or holds a position in the administrative body

Any doubts about the interpretation of the conflict of interest, own or family, should be consulted with the Compliance Officer.

5°.5 Gifts and Considerations

All aspects relating to the above shall be directly governed by the provisions of Chapter II of the Code of Good Practices for the Pharmaceutical Industry.

Specifically, in accordance with point 10 of the above-mentioned Code, in order to avoid incentivising the prescription, dispensation or administration of prescription drugs, the offering or giving by direct or indirect means to healthcare professionals of any form of incentive, bonus, or gift (in cash or in species) is strictly prohibited. Excepted from the foregoing prohibition is the offering or giving of implements for the medical or pharmaceutical practice or desk items not directly related to a prescription drug with a market price not exceeding €10.

The members of the Juste Group may not accept gifts, invitations or any compensation from customers, suppliers, competitors, or third parties exceeding the amount of 50€.

Any doubts about the opportunity to receive an attention or deliver a present must be made known to the Compliance Officer, so that, where appropriate, authorize or deny the application made.

5°.6 Safe working environment

The Juste Group is committed to its employees to provide a safe and healthy working environment. To this end, it has incorporated specific control and supervision procedures for the Group's staff to carry out their professional work in the best socio-health security conditions that can be offered.

Juste Group members can direct their requests for improvement or communication of any incident to the Human Resources Department.

5°.7 Relationship with Clients and Third Parties

The Persons belonging to the Juste Group shall observe the principle of transparency and are obliged to ensure that none of their actions can potentially be interpreted as deceitful behaviour harmful to clients, suppliers or third parties.

The principle of fair agreement will guide all of the Juste Group's relationships with its customers. For their implementation the relations between the two must be carried out on an equal footing and with total honesty and transparency.

Any claims from clients or others shall be processed in accordance with the established internal procedure and documented and replied to in due time and form by the person or body designated for such purpose.

The Persons belonging to the Juste Group shall not offer, promise, give or receive to or from third parties any type of handout, bribery or unjustified commissions. Acts of bribery, which are expressly prohibited and punishable, include directly or indirectly offering or promising any type of advantage or making use of any instrument for their concealment.

No gifts or considerations will be offered or given to companies or institutions with which the Juste Group has a business relationship whenever it is likely that such gifts or considerations may improperly affect their decision-making processes or the relationship itself.

In addition, members of the Juste Group should have special diligence when contributions, investments, deposits, purchases, etc., occur to prevent funds received from having a criminal origin.

5º.8 Relationship with Authorities or Public Officials

The Persons belonging to the Juste Group shall not offer, promise or give any type of handout or any form of bribery or benefits to public officials or authorities, or any unjustified commissions to third parties. Acts of bribery, which are expressly prohibited and punishable, include directly or indirectly offering or promising any type of advantage or making use of any instrument for their concealment.

No gifts or considerations will be offered or given to companies or institutions with which the Juste Group has a business relationship whenever it is likely that such gifts or considerations may improperly affect their decision-making processes or the relationship itself.

Persons in any way related to any authority or public official that could potentially influence any aspect of society must avoid influencing, even indirectly, the making of any decisions affecting the Juste Group.

Any doubts arising in this area should be consulted with the Compliance Officer.

5º.9 Relationship with other Political Parties

Any type of donations to political parties, their foundations or federations on behalf of the Juste Group, or the use of the Group's funds to directly or indirectly finance any political party is strictly prohibited.

5º. 10 Relationship with other Companies

The relationship with competitor companies must be conducted in good faith and governed by the principle of respect towards other parties' business activities. The

Persons belonging to the Juste Group are obliged to take appropriate steps to keep confidential any reserved or confidential information of other companies to which they may have lawfully had access in the course of business negotiations or relations.

The principle of fair agreement will guide all of the Juste Group's relations with suppliers and companies in the sector. For their implementation, the relations between them will develop on an equal footing and with total honesty and transparency.

Persons in charge of the submission of offers in public or private tender processes shall refrain from any type of conduct that could in any way be construed as price fixing, either with the entity issuing the call for tenders or with other tenderers.

Professional secrecy must in any case be respected, acting diligently with non-public documentation or information to which legitimate access has been had. In case of any doubts about the correct use of business information, the consultation with the Compliance Officer should be high.

No worker joining the Juste Group shall make use of any confidential or secret information he/she may have obtained from his/her previous employment. The unlawful use of any such documentation external to the Group is expressly prohibited.

The Persons' obligations of confidentiality shall persist indefinitely, including beyond the termination of their employment. Employees shall not take any type of information or documentation away from the Juste Group, including any information held in computer storage media, and shall not provide to or make use of such information to the benefit of other companies.

5°.11 Export Compliance

To ensure the highest standards of compliance in international trade relations, the Group has adopted a specific Export Compliance procedure. This procedure lays down ethical principles so that the action carried out in the execution of professional export activities complies with the principles of legality, integrity and transparency. This establishes a procedure for evaluating, managing and controlling all business transactions.

The Export Compliance procedure ensures the Group's position to avoid possible sanctions for regulatory non-compliance, minimizes risk to customers, maintains the corporate image, builds trust and strengthens corporate culture, and underpins the path of Corporate Social Responsibility by ensuring the sustainability of the project.

5°. 12 Fulfilment of Obligations with the Tax Authorities and Others

The fulfilment of the tax obligations and social security contributions that the Juste Group is subject to shall be carried out in good faith and in a responsible manner, in accordance with the applicable legislation.

The Persons belonging to the Juste Group are obliged to observe the principles of clarity, transparency and truthfulness in the performance of their professional duties. Any forgery, concealment or simulation of data, accounting entries, etc. for the purpose of avoiding payments or obtaining unlawful benefits with harmful consequences for the Tax or Social Security authorities or any creditor is strictly prohibited.

The financial information of the Group shall faithfully represent its true financial and equity situation in accordance with generally accepted accounting principles and international financial information standards. In this regard, no professional shall conceal or distort any information in the accounting records and reports of the Juste Group.

The Persons responsible for accounting and finance within the Juste Group shall assure full compliance with the applicable legislation and regulations relating to accounting, financial, tax or any other aspects affecting the Group's tax filings.

5º.13. Respect for Intellectual Property, Industrial Property and Advertising Actions

The Persons belonging to the Juste Group shall respect the intellectual and industrial property rights of other parties in the performance of their professional duties.

No images, texts or drawings shall be used in the Group's advertisements or official documents for which appropriate authorisation has not been obtained from their lawful owner.

It is likewise prohibited to use brands or logos in the Group's advertisements or official documents unless they have been registered in the Juste Group's name or the necessary authorisation has been obtained, or unless it has been verified that there are no prior industrial property rights registered in the name of other parties.

Any advertising carried out by the Group shall be truthful and shall not contain deceptive statements likely to harm potential clients.

5º.14 Use of IT Systems

The IT systems and corporate email accounts shall be used solely for purposes associated with the business activity, and must be used in a responsible and careful manner.

The Juste Group reserves the power to monitor the use of the IT systems and the use of the Internet by the Persons as a means of regulating worker use of company-owned IT equipment, in the context of the employer's powers of surveillance and monitoring of obligations regarding the use of the aforesaid equipment, always with due respect for the fundamental rights of the individuals involved.

The warning regarding the possible use of such power expressly eliminates the reasonable expectation of privacy on the part of the Persons belonging to the Group regarding their use of the corporate IT systems.

The Persons belonging to the Juste Group shall not under any circumstances make use of the corporate IT systems to carry out activities that could potentially be deemed unlawful, and the Persons belonging to the Group are expressly prohibited from accessing the IT applications or equipment of others without their owners' prior documented authorisation.

6º Reporting of Infringements

Pursuant to Article 31.bis.5.4 of the Spanish Criminal Code, all the Persons belonging to the Group, as well as its external consultants, are obliged to report any potential risks and infringements to the Group's Criminal Risks Prevention and Control Body. For such purpose, a Reporting Channel is made available to all employees of the Juste Group at the following email address: canaletico@grupojuste.com. Through this, or any other means deemed appropriate, the members of the Group may send their communications to the Compliance Officer in a confidential manner.

In order to materialize the commitment to transparency and honesty, the channel is open for any member of the Group to be able to make unethical behaviors, interpretation inquiries, questions about specific issues, or communications of illegals known to the Compliance Officer. The regulation of the ethical channel is developed in the Manual of Prevention of Criminal Risks. It ensures the whistleblower's position in good faith, confidentiality, prevents any retaliation against him and allows anonymous communications.

It is the duty of all the Persons in the Group to report any infringements of they may become aware, and any Person's attempt to prevent or obstruct the discovery of any improper or unlawful conduct of which they may have become aware shall be considered a very serious offence.

The reporting channel is also open to suppliers, clients or any individual who may have become aware of any unethical behaviour and wishes to report it to the Compliance Officer.

7º Disciplinary Regime

Any infringements of the present code or of the Code of Good Practices for the Pharmaceutical Industry shall be subject to appropriate and lawful disciplinary penalties in accordance with the applicable labour and industry-specific legislation and the applicable Collective Bargaining Agreement, in addition to which any behaviour potentially constituting a criminal offence shall be reported to the competent authorities.