

Code of Ethics

July 2023 version

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1 Presentation

The Juste Group is committed to the principles of transparency, legality and integrity, and has therefore approved this Code of Ethics, which was created with a commitment to global compliance in all regulatory aspects that may affect the activity of the Group and with a strong determination to establish ethical canons that are respected by everyone who forms a part of the Group.

This Code of Ethics encompasses the general lines of our Culture of Compliance which, from the management, is passed on to all the personnel of the Juste Group and serves to strengthen the commitment to ethics and social responsibility of the Group. This commitment goes beyond mere compliance with the regulations in force and establishes high ethical standards that are intended to serve as guidelines for action for all Juste Group personnel.

The Boards of Directors of JUSTESA IMAGEN S.A.U, JUSTE S.A. QUÍMICO FARMACEÚTICA, JUSTE FARMA S.L. and CENINTER S.L. ("The Juste Group") have approved this Code as their own, establishing the principles of conduct and the ethical standards that must be followed by everyone who forms a part of the Group.

Together with this Code, the Juste Group adheres to the "Code of Good Practice for the Pharmaceutical Industry" of Farmaindustria. Both documents are complementary, such that everyone in the Juste Group should be familiar with and comply with both the Code of Good Practice for the Pharmaceutical industry and this Code of Ethics.

The Code of Ethics represents a mandatory action guide which elaborates on ethical principles so that any action carried out in the performance of professional activities complies with the principles of legality, integrity and transparency, in accordance with the traditional values of our company, and serves to strengthen the Culture of Compliance that presides over all the actions of the Juste Group.

2 Scope of Application

The present Code of Ethics has been approved by the Administrative Bodies of the Juste Group companies and compliance with this code is mandatory for both directors, as well as managers, employees, interns, trainees, external collaborators and anyone rendering services in the Group through contracts or sub-contracts ("members of the Juste Group"). All of them are bound to respect the principles contained herein and to comply with the internal procedures for the best operation of the company.

Likewise, in accordance with Law 2/2023, this Code of Ethics is also applicable to individuals who have terminated their employment contract, as well as to those who, even though they have not been hired, may have been aware of violations during the selection or negotiation process and to representatives of the workers, in the exercise of their duties.

3 Knowledge and Compliance

All persons employed in the Juste Group are bound to the Code of Ethics. This will be given to them, or otherwise made available to them, so that they may become familiar with it and raise any questions that may arise from its interpretation.

The Code of Ethics, despite being a very complete document, cannot foresee every case that individuals involved in the Juste Group may face in their daily work. They are required to make decisions that are most in line with their professional practice and ethical commitment. Therefore, in situations where a conflict may arise that is not resolved by the Code, these simple questions can be used to clarify whether the decision made is the appropriate one. In these situations, the person who is in doubt about a course of action should ask themselves the following questions:

- ✓ Is it legal?
- ✓ If so, does it comply with Group policies and procedures?
- ✓ If it complies with both, is it right to act in this way?
- ✓ And, as a complement to the previous question, is it possible to explain the action without it being perceived by third parties as improper conduct?

If situations of regulatory, ethical or moral conflict arise, individuals who are part of the Juste Group must submit their queries to the Compliance Officer, as the reference body in charge of resolving this type of conflict or any other controversial situation that may arise.

Compliance with the Code of Ethics is mandatory for all members of the Group, who must respect it in the exercise of their professional activity. If any of the principles or rules included in the Code of Ethics are found to be contradictory or inconsistent, or give rise to interpretative doubts, they must be brought to the attention of the Compliance Officer for analysis and, if necessary, for the Board of Directors to modify any aspects considered appropriate.

4 Fundamental Principles and Values

4.1 Compliance with Applicable Legislation

Everyone involved in the Juste Group must respect and comply with the regulations applicable to their professional sphere action. Specifically, and due to the special regulation of the sector, the legal regulations related to the distribution and production of drugs and medical devices shall be fully complied with.

4.2 Integrity and Transparency

The specific activities carried out by the Juste Group with its clients and with third parties requires that the actions of its members be governed by honesty, clarity and transparency in management.

This commitment includes integrity and transparency in commercial and financial management. In order to comply with this, internal policies and procedures are in place to ensure compliance with regulations and good commercial and financial practices. These internal regulations ensure adequate training of the people tasked with this type of management, supervision of those responsible and internal control systems to periodically check for proper compliance.

4.3 Respect, Dignity, Non-discrimination and Gender Equality

The conduct of everyone involved in the Juste Group shall be governed by respect for all. Under no circumstances shall a lack of respect or hostile or humiliating attitude towards another person be allowed or tolerated in the scope of the professional relationship or in the facilities of the Juste Group.

The dignity of people, as well as the absence of personal and professional discrimination, are established as two fundamental principles that must govern the behavior of all members of the Juste Group.

The principle of equality represents a fundamental value in the Juste Group, and for its correct fulfillment, gender, as well as any other differences that could possibly be involved (age, religion, abilities, etc.) shall be respected in all the areas of the Group, promoting equal treatment between men and women (as well as religions, ages, abilities, etc.) with regard to access to employment, training, promotion of professionals and working conditions.

The foundation of this principle of equality is based on mutual respect between all people, without characteristic biases based on race, religion, ethnicity, nationality, sexual orientation, disability, or any other reason contrary to the legislation in force. The Juste Group strives to have a diverse team and is committed to maintaining a safe working and professional environment, where talent and diversity of contributions are valued.

The Group has a Protocol for Prevention and a Procedure for Dealing with Harassment in the Workplace, which is the result of the concern and commitment to prevent, avoid, resolve and sanction any cases of workplace bullying or sexual harassment that may occur, as an essential requirement to guarantee the dignity, integrity and equal treatment and opportunities of everyone in the organization.

Under this Protocol, the management is committed to investigating all complaints of harassment, for which purpose a procedure is established for the resolution of such conflicts. This procedure, drafted in accordance with the recommendations included in the European Framework Agreement on harassment and violence in the workplace signed on April 26, 2007, guarantees the right to privacy and confidentiality of the matters dealt with and of the persons involved.

The Juste Group shall not consent to any action that may involve physical violence or psychological or social coercion. All persons of the Group are entitled to avail themselves of the protection mechanisms indicated with the guarantee that they will not be subjected to intimidation or unfair, discriminatory, or unfavorable treatment. This protection shall extend to all persons involved.

Conduct constituting workplace or sexual harassment is considered a very serious offense under the Disciplinary Regulations of the Group, and in the event of such conduct, it will be punished, depending on the seriousness of the facts, with suspension of employment and salary, transfer or disciplinary dismissal, without prejudice to referral to the corresponding authority in accordance with the circumstances of the case.

4.4 Responsibility to the Pharmaceutical and Chemical Sector

The Juste Group boasts an important tradition in the pharmaceutical sector and during all these years the principles of honesty, transparency and integrity have dictated its actions. Its commitment extends to the outright rejection of any type of commercial policy that could be contrary to free competition and could be detrimental to the market, as well as the stockpiling of medical devices that could cause market shortages or an artificial alteration of prices. The greatest assets of the Juste Group are its professionals and the quality of its products, which are marketed with total safety and with the honesty of a traditional operator in the market, rejecting aggressive sales policies or any type of action that could be identified as anti-competitive practices.

4.5 Respect for the Environment

The Juste Group is totally committed to respecting the environment and, since the beginning of its activity, it has acquired the commitment to prevent its

industrial activity from damaging it. The highest quality standards have been implemented for the protection of the environment, which are periodically controlled by the people in charge within the Group and audited by external auditors in order to ensure an adequate and safe environment.

5 Rules of Conduct

5.1 Protection of Privacy and Personal Data

Members of the Juste Group are obliged to respect the personal and family privacy of everyone, both employees and anyone else to whose data they have access as a result of their professional activity. The use of such data must follow the established channels, complying with the general principles of use and compliance with internal procedures. Compliance with the procedures and manuals that are established in relation to data protection regulations is obligatory for the members of the Juste Group involved therein.

Safeguarding of privacy must be paramount, for which reason any type of communication or comment, even informal, that may affect the privacy or confidentiality of a third party must be avoided.

5.2 Confidentiality

Respect for the confidentiality of the data and information on third parties to which access is legally granted must be treated with the utmost diligence to safeguard the rights of the third parties concerned.

The non-public data held by the Juste Group on clients, suppliers, employees or third parties are confidential and must be treated in compliance with the contractual confidentiality agreements to which they are subject and, in any case, in accordance with the data protection or business secrecy regulations as applicable. Individuals handling documents, information or data of this type are responsible for their safeguarding and appropriate use.

Pursuant to Article 1 of Law 1/2019, of February 20, 2019, on Trade Secrets, any information or knowledge, including technological, scientific, industrial, commercial, organizational, or financial, that meets the following conditions shall be considered a trade secret:

- a) Being secret, in the sense that, as a whole or in the precise configuration and collection components, it is not generally known to persons belonging to the circles in which the type of information or knowledge in question is normally used, nor is it readily accessible to them;

- b) having a commercial value, either actual or potential, precisely because it is secret, and;
- c) having been the subject of reasonable measures on the part of its owner to keep it secret.

The information and documentation of the Juste Group that is not public, is considered an asset qualified as a trade secret, and its appropriation by the members of the Group for a purpose other than that for which it has been granted access is not permitted.

All members of the Group, including persons who provide their services sporadically or intermittently in certain activities, are obliged to respect the confidentiality of documents and information to which they may have access, even occasionally, in the course of their duties. This information must not be disclosed or transmitted, either in writing or verbally, unless expressly authorized by the Compliance Officer.

The duty of confidentiality of anyone who has had access to personal data and/or confidential or secret information shall subsist even after the employment relationship has ended.

Likewise, the confidentiality and identity of whistleblowers shall be protected, under the terms of Law 2/2023.

5.3 Rules of Conduct in the Work Environment

The Juste Group shall not allow the consumption of drugs, psychotropic substances, stimulants or alcohol in the workplace. This includes the express prohibition of any person who is under the influence of such substances from entering the workplace, since this may create a risk to themselves or to a third party. In such cases, the person under the influence of any of these substances must leave the facilities of the Group and the Human Resources Department must be informed.

Smoking is prohibited on Group premises.

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

5.4 Conflict of Interest

Situations in which there is a conflict of interest must be avoided. If the conflict arises during a commercial, business or professional operation, it must be reported to the Compliance Officer.

A conflict of interest is deemed to exist in those situations in which the personal interest of the employee, or of a person related to them, is in conflict with any of the companies in the Group.

The following shall be considered as persons related to the employee:

- The spouse of the employee or a person to whom they are related by an analogous affective relationship, even if they do not live together.
- Siblings, sisters, siblings-in-law, ascendants or descendants of the employee or of their spouse, or person related to them by a similar personal relationship, even if they do not live together.
- Companies in which the employee, or a person related to them, by themselves or through an intermediary, hold a position of control or occupy any position in the administrative body.

Any doubts about the interpretation of the conflict of interest, whether personal or concerning family members, should be consulted with the Compliance Officer.

5.5 Gifts and Courtesies

Chapters II and III of Title I of the Code of Good Practice for the Pharmaceutical Industry are directly applicable in all matters relating to this aspect.

Specifically, and in accordance with section 10 of the aforementioned Code, in order to avoid any incentive to prescribe, dispense or administer prescription drugs, it is forbidden to offer or provide directly or indirectly to healthcare professionals, customers, suppliers or third parties any type of incentive, bonus or gift (in cash or in kind). This includes the prohibition of extending invitations to recreational events. Excepted from the above prohibition is the offering or provision of tools for medical or pharmaceutical practice or stationery that are not related to a prescription drug and whose market price does not exceed €10.

Juste Group members may not, by themselves or through an intermediary, accept gifts, invitations or any type of compensation from customers, suppliers, competitors or third parties, which exceed the amount of €50.

Any doubt about the opportunity to receive a gift or present must be brought to the attention of the Compliance Officer, so that, if applicable, they may authorize or deny the request made.

5.6 Safe Work Environment

The Juste Group is firmly committed to its employees to provide a safe and healthy working environment. For this purpose, it has implemented specific control and supervision procedures so that all the members of the Group carry out their professional work under the best possible conditions of social and health safety.

Members of the Juste Group may address their requests for improvement or communication of any incident to Human Resources Management.

5.7 Relations with Clients and Third Parties

The members of the Juste Group must respect the principle of transparency, and are obliged to ensure that no action might be construed as deception to the detriment of clients, suppliers or third parties. Honesty and integrity must govern any action taken in the name or on behalf of the Juste Group.

The principle of fair agreement shall guide all relations of the Juste Group with its clients. For this purpose, relations between the two parties must be conducted on an equal footing and with total honesty and transparency.

Any complaint from a client or third party shall be processed in accordance with the internal procedure, documented and answered in an appropriate manner and form by the person or body designated for this purpose.

Members of the Juste Group shall not promise, give or receive any kind of gift or bribe or undue commission to or from third parties. Acts of bribery, which are expressly prohibited and punishable, include the offer or promise, directly or indirectly, of any type of advantage or the use of any instrument for their concealment.

No gifts or courtesy shall be offered or provided to companies or institutions with which the Juste Group has a relationship and which may unduly influence their decision-making processes or the relationship itself.

Likewise, the members of the Juste Group shall exercise special diligence in the scope of commercial or business relationships where contributions, investments, deposits, purchases, etc. from third parties take place, in order to ensure that the assets or funds received are not of criminal origin. Any type of commercial operation that raises doubts as to the origin of the funds of the client must be stopped and the Compliance Officer must be informed of the issue.

5.8 Relations with Authorities or Public Officials

Members of the Juste Group shall not offer, promise or provide any type of gift or form of bribe or unjustified benefit to public officials or authorities. This includes any form of unjustified commission to a third-party intermediary that has a relationship with the government and involves intermediaries or agents acting on behalf of the Group. Acts of bribery, which are expressly prohibited and punishable, include the offer or promise, directly or indirectly, of any type of advantage or the use of any instrument for their concealment.

No gifts or courtesies shall be offered or provided to public officials, authorities or institutions, whether or not they have a professional relationship with the activity of the Juste Group.

Individuals who have a relationship with any authority or public official who may decide on any aspect related to the group, must avoid influencing, even indirectly, any decision-making that affects the Juste Group.

Any doubt that may arise in this area must be discussed with the Compliance Officer.

5.9 Relations with Political Parties

It is forbidden to make any type of donation to political parties, their foundations or federations, on behalf of the Juste Group or to use its funds to finance a political party, even indirectly.

5.10 Relations with Other Companies

Relations with competing companies shall be conducted fairly and shall be governed by the principle of respect for the business activity of the third party. Members of the Juste Group are obliged to ensure that the confidentiality of any kind of restricted or sensitive information of other companies, to which they have had access in a lawful manner and within the framework of negotiations or business relations, is maintained.

The principle of fair agreement shall guide all relations of the Juste Group with suppliers and companies in the sector. For this purpose, relations between these parties must be conducted on an equal footing and with total honesty and transparency.

The personnel in charge of managing the submission of bids in public or private tenders must refrain from any type of conduct that could be construed as price fixing, either with the bidder itself or with third party participants.

Professional secrecy must be respected in all cases, acting diligently with non-public documentation or information to which legitimate access has been obtained. In the event of any doubt about the correct use of business information, the Compliance Officer must be consulted.

No employee who joins the Juste Group may use confidential or secret documentation that they may have obtained from their previous employment. This illicit use of documentation outside the Group is expressly prohibited.

The duties of confidentiality of individuals shall persist indefinitely, even after the employment relationship has ended. The employee may not take any type of information or documentation of the Juste Group, including that encountered in IT support when the employment relationship ends, nor provide or use such information in the interest of another company.

5.11 Export Compliance

To ensure the highest standards of compliance in international business relations, the Group has adopted a specific Export Compliance procedure. This procedure establishes the ethical principles to ensure that the actions carried out in the performance of professional export activities comply with the principles of legality, integrity and transparency. To this end, a procedure is established to evaluate, manage and control all commercial transactions.

The Export Compliance procedure ensures the standing of the Group to avoid possible sanctions for non-compliance with regulations, minimizes the risk to customers, maintains the corporate image, generates trust and strengthens the corporate culture, and cements the path of Corporate Social Responsibility, ensuring the sustainability of the project.

5.12 Fulfillment of Obligations to the Tax Authorities and Third Parties

The fulfillment of tax obligations and the payments to Social Security to which the Juste Group is obliged shall be carried out in a responsible and honest manner, pursuant to the laws in force.

The members of the Juste Group are obliged to respect the principles of clarity, transparency and truthfulness in their professional duties. The falsification, concealment or simulation of data, accounting entries, etc., with the purpose of evading payments or obtaining illicit benefits that cause damage to the Public Treasury, to Social Security or to any creditor, is totally forbidden.

The economic and financial information of the Group must faithfully reflect its real economic, financial and asset situation, in accordance with generally accepted accounting principles and the applicable international financial

reporting standards. For these purposes, no employee shall conceal or distort the information in the accounting records and reports of the Juste Group.

The members of the Juste Group responsible for accounting and finance are obliged to comply exhaustively with the regulations that affect any aspects related to accounting, financial, economic, tax, or any other that affects the tax declarations of the Group.

5.13 Respect for Intellectual Property, Industrial Property and Advertising or Commercial Actions

The members of the Juste Group must respect the intellectual and industrial property rights of third parties in the performance of their professional work.

Images, texts or drawings shall not be used in the Group's advertising or official documents without the corresponding authorization of their legitimate owner.

Likewise, it is forbidden to use brands or logos in the publicity or official documents of the Group that have not been previously registered under the name of the Juste Group, or for which the corresponding authorization has not been obtained, or for which it has not been verified that there is no previous industrial property right registered in favor of a third party.

The advertising used by the Group must be truthful and may not contain misleading statements that may cause damage to potential customers.

5.14 Use of Computer Systems

The computer systems and the use of corporate email must be exclusively used for purposes related to professional activity and their use must be responsible and diligent.

The Juste Group reserves the right to monitor the use of the computer systems and the use of the Internet by its members, as a system of management and regulation of the use of corporate computing resources by the employee, and within the scope of the corporate power of monitoring and control of compliance with the obligations relating to the use of the means in question, always with full respect for fundamental rights.

The warning of the option to use the aforementioned power expressly eliminates the reasonable expectation of privacy that the members of the Juste Group may have in relation to the use of the corporate computer systems.

The members of the Juste Group may under no circumstances use the corporate computer systems to carry out actions that could be considered illicit, and it is expressly forbidden for the members of the Group to access computer

applications or equipment belonging to third parties without the prior and documented authorization of their owner.

6 Communication of Violations, Internal Information System and whistleblower protection

All members of the Juste Group, as well as their external collaborators, are obliged, in accordance with Article 31.bis.5.4 CP [Spanish Penal Code], to inform the Compliance Officer of any unlawful actions of which they become aware related to the Juste Group that represent any violation of the legal system.

For these purposes, and in compliance with Law 2/2023 of February 20, *regulating the protection of persons who report regulatory violations and the fight against corruption*, the internal information system has been adapted to the aforementioned regulations and is made available to the personnel through the Ethical Channel at the following email address canaletico@grupojuste.com. All members of the Juste Group may use this channel to communicate securely and confidentially with the Compliance Officer. The system also allows verbal communication at telephone number 649 203 286 directly or through a voice message. If the whistleblower prefers to use the postal channel, they can send their communication to Grupo JUSTE, Avda. de San Pablo, 27. Coslada 28823.

In order to materialize the commitment to transparency and honesty, the internal information system is open so that any member of the Group may inform the Compliance Officer of any regulatory violations, as well as unethical behavior, interpretation queries, questions on specific issues, or reports of criminal or administrative offenses.

The communication of regulatory infringements of which they become aware is a specific duty of all members of the Juste Group, and conduct aimed at preventing or hindering the discovery of any improper or unlawful conduct of which they become aware shall be considered a very serious misconduct.

Likewise, the ethical channel is open to suppliers, customers or any person who has a relationship with the Group who has become aware of any action or omission that constitutes a breach of regulations and wishes to report it to the Compliance Officer.

The Juste Group guarantees the protection of the whistleblower in accordance with Law 2/2023, and for this purpose it has a policy on the general principles of the internal system of information and defense of the whistleblower.

Data protection:

The processing of personal data deriving from the application of Law 2/2023, of 20 February, *regulating the Protection of persons who report regulatory violations and the fight against corruption* will be governed by the provisions of Regulation

(EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights.

In compliance with the General Data Protection Regulation (GDPR) and Organic Law 3/2018 (LOPD-GDD), we inform you that the data collected will be processed by the Data Controller, Grupo Juste, for the purpose of managing the relevant investigations into the reported facts and maintaining the information that may be communicated through the Ethical Channel confidential and subject to the due guarantees and privacy measures legally required.

Legal basis:

The processing of personal data of the whistleblower, people affected, and third parties involved will be carried out in order to comply with a **legal obligation** Article 6.1.c) of the RGPD, applicable to the Data Controller in the prevention of crime and the fight against corruption.

If it is not mandatory or the processing of personal data arises from a Public Disclosure, the processing shall be carried out for the **fulfillment of a task carried out in the public interest** or in the exercise of public authority vested in the Controller, Article 6(1)(e) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, GDPR.

The processing of **special categories of personal data** shall be carried out where necessary for reasons of **essential public interest**, on the basis of Union or Member State law, which must be proportionate to the aim pursued, and must respect the essential requirements of the right to Data Protection and provide for adequate and specific measures to protect the interests and fundamental rights of the data subject as provided for in Article 9(2)(g) of Regulation (EU) 2016/679. GDPR.

Without prejudice to the rights that correspond to the whistleblower in accordance with the regulations in force, Grupo Juste guarantees the confidentiality of the identity of the whistleblower, which must be kept safe and will not be communicated in any case to the affected people, as well as that there will be no reprisals for having reported irregularities, nor for having participated in the investigation procedure.

The personal data provided will be kept for a maximum period of **3 months** from the date of the report, unless they are needed as evidence. Subsequently, only the necessary data will be kept for the ongoing investigation of the related complaints by Grupo Juste, which will be in charge of carrying out the procedure.

If it is substantiated that the information provided or part of it is not truthful, it shall be immediately deleted as soon as such circumstance becomes known, unless such lack of truthfulness may constitute a criminal offense, in which case the information shall be kept for the necessary time during the processing of the judicial proceeding.

Communications that have not been followed up on may only be recorded in anonymized form, without the obligation to block provided for in article 32 of Organic Law 3/2018, of December 5, being applicable.

The data provided will be processed and, if absolutely necessary, will be transferred to interested third parties, such as the Public Authorities for the purposes of investigation and clarification of the reported facts, determination of responsibilities, implementation of corrective actions and, if necessary, filing of the legal and disciplinary actions required before the responsible Bodies in each case.

The whistleblower or data subject about whom data is provided may exercise their rights of access, rectification, suppression, opposition, limitation to the processing, withdrawal of consent and portability by means of postal mail to Grupo Juste, C/Avenida San Pablo, 27, 28823 Coslada. Madrid (Spain), or by email to privacidad@grupojuste.com In addition, they may file a complaint with the [Corresponding Data Protection Authority](#) if they believe that their rights have been infringed.

In the event that the person concerned by the facts described in the communication exercises the right to object, it will be presumed that, unless proven otherwise, there are compelling legitimate grounds that legitimize the processing of their personal data.

7 Disciplinary Regime

Without prejudice to the protection and guarantee in disciplinary matters for those persons who report any wrongdoing through the internal whistleblower channel of the Juste Group, there are internal Disciplinary Regulations that shall apply to the infractions of this Code that are contemplated in these internal rules. These infractions, as well as those included in the Code of Good Practice for the Pharmaceutical Industry, will entail the lawfully appropriate disciplinary sanctions in accordance with the Disciplinary Regulations, the labor and sectorial

legislation and the applicable Collective Bargaining Agreement, without prejudice to bringing to the attention of the competent authority any behavior that could constitute a criminal offense.

It should be borne in mind that a breach of the Code of Ethics may have different consequences for the person who violates it, as it may give rise to an internal disciplinary sanction, but may also lead to an administrative sanction — depending on the sectoral regulations violated— as well as constituting some type of criminal offense that may lead to the criminal liability of the offender and of the Group itself. All this will be determined according to the particular violation and the scope of the activity carried out. A summary table with examples of hypothetical behaviors and their possible consequences is provided as Annex I, solely by way of example, in order to emphasize the importance of compliance with the Code of Ethics and all internal regulations.