







## TABLE OF CONTENTS

01	SCOPE	04
02	ETHICS AND COMPLIANCE	08
03	MISSION	10
04	VALUES	12
05	PRINCIPLES OF HIPRA'S RELATIONSHIP WITH STAKEHOLDERS	14
06	OUR COMMITMENTS +	18
07	CODE COMPLIANCE. COMMUNICATION CHANNEL	39
08	DISSEMINATION, TRAINING AND AWARENESS	42
09	ENTRY INTO FORCE AND EFFECTIVENESS	45

HIPRA

01

SCOPE





This Code of Ethics applies to **all employees**, managers and management bodies of all companies and subsidiaries of the **HIPRA Group** worldwide.

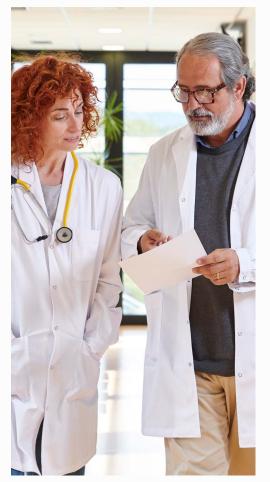


#### The Code also sets out the core values, principles and commitments

that apply to them regardless of where they operate and the industrial or commercial sector in which they operate.











HIPRA expects that the companies and operators with which we interact will adhere to the commitments set out in this Code of Ethics, and that their conduct will be aligned with them.

This **Code of Ethics will be complemented by internal regulations** (policies, protocols, manuals, SOPs, etc.) adapted to the local regulations of the companies and subsidiaries of the HIPRA Group and the sector in which they operate. This internal regulation will ensure that our ethical principles are implemented effectively and consistently in each specific context, ensuring compliance with applicable regulations and industry best practices.

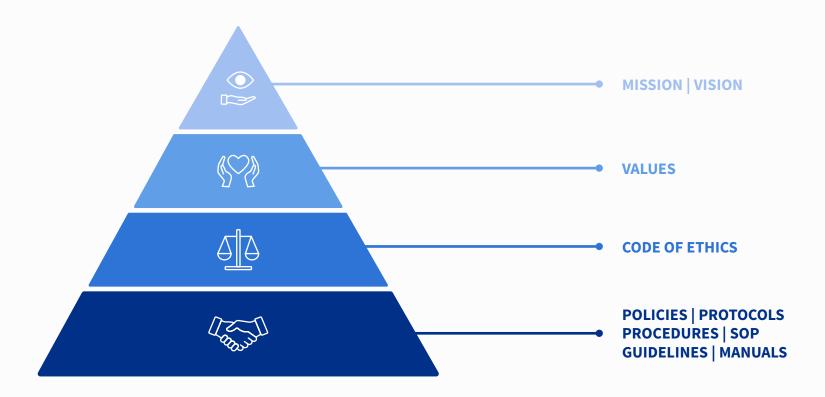
HIPRA will not tolerate conduct contrary to this Code of Ethics.





This Code of Ethics is an essential element of the **Compliance Management System** implemented at HIPRA, consisting of a set of policies, protocols, procedures and internal controls designed to ensure that the organisation:

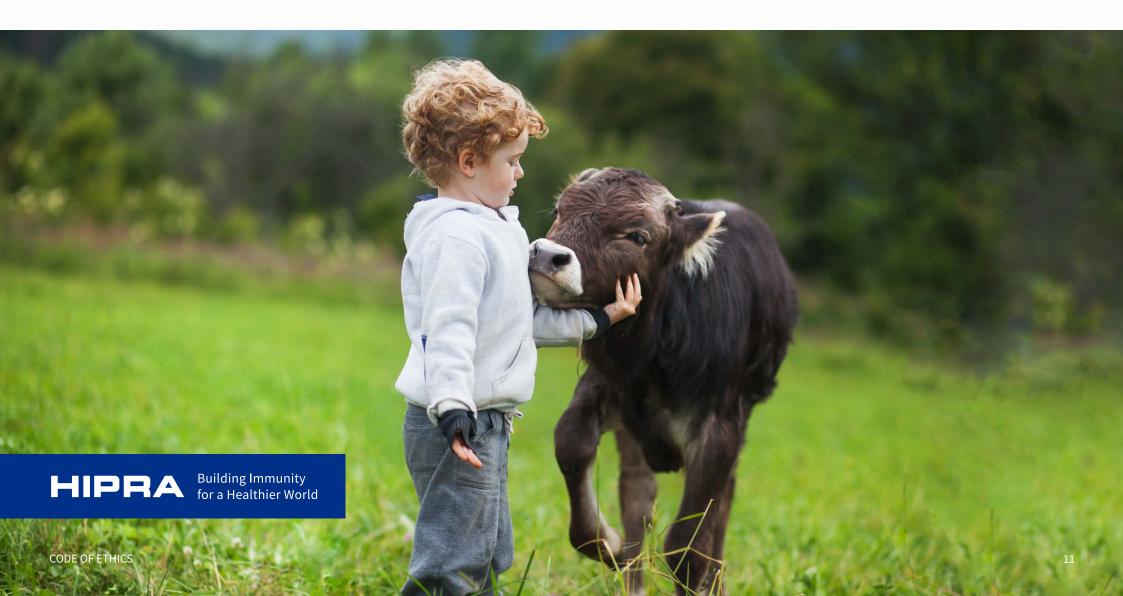
- (i) complies with applicable laws, rules and regulations in the sectors and countries where it operates
- (ii) acts in accordance with applicable ethical standards
- (iii) implements mechanisms for the prevention, detection and management of risks.



HIPRA 03 MISSION



HIPRA's mission is **to build immunity for a healthier world.**With all our enthusiasm, knowledge and talent at your service, we are committed to continue to innovate solutions that have a positive impact on the health of people and animals.



HIPRA

04

**VALUES** 



At HIPRA, we are committed to innovating solutions that have a **positive impact on the health of people and animals.**Throughout our history, we have evolved thanks to our solid values and the way we work.







**OPTIMISM** as our way of being

NON-CONFORMISM by nature

We have a unique corporate culture that uniquely addresses our stakeholders with whom we have built a long-term relationship of trust based on Excellence, Optimism and Non-Conformity. The sum of these three values helps us build HIPRA's credibility in the marketplace.





HIPRA interacts with a wide range of stakeholders, countries, and industrial and commercial sectors. Facilitating seamless communication and **collaboration with our stakeholders is critical** to building trust and facilitating respectful and sustainable growth.





The following are the basic principles of relations with HIPRA's main stakeholders.

These principles are general and should always be interpreted based on the country and industry in which HIPRA is acting.



**Personnel:** We are committed to a safe, healthy, cooperative working environment, free of discrimination and harassment. We also strive for equal opportunity career development by valuing people on the basis of their merits and competencies.



**Clients:** At HIPRA, we work tirelessly to provide our customers with products or services that meet the highest standards of quality and safety.



**Professionals in Human and Animal Health:** We ensure that the information we provide about our products is truthful, transparent and has been approved by the competent authorities. Our commitment to improving healthcare by healthcare professionals is firm, and in this context, we work to facilitate their professional development, in accordance with the Codes of Good Practice to which we adhere.



**Patients:** The health of people, animals and the environment (One Health) is HIPRA's core purpose and what justifies our work. We seek to improve quality of life and optimise research processes, providing innovative and effective solutions. With regard to patient associations, HIPRA acts in accordance with the Codes of Good Practice to which we adhere.





**Suppliers:** To deliver on our commitment to provide quality and safe products and exemplary service, supplier selection is conducted in a fair and transparent manner, based on objective criteria.



**Shareholders:** We strive to create value and meet the interests of our shareholders. We also safeguard the assets and resources of the organisation, with a common goal of prosperity and sustainability.



**Authorities and Public Administrations:** We work to comply with our duties of transparency, providing truthful and transparent information about our products, and making the relevant communications when required by law and/or the Codes of Good Practice to which we adhere.



**Society:** We have an ongoing dialogue with society to maximise opportunities to create shared value and minimise impacts that are not positive.





6.01	COMPLIANCE WITH THE LAW	6.15	DONATIONS, GRANTS AND SPONSORSHIPS
6.02	RESPECT FOR HUMAN RIGHTS	6.16	MONEY LAUNDERING AND TERRORISM FINANCING
6.03	EQUALITY, DIVERSITY AND NON-DISCRIMINATION	6.17	RELIABILITY OF FINANCIAL REPORTING
6.04	SELECTION, PERFORMANCE AND DEVELOPMENT	6.18	COMPLIANCE WITH CUSTOMS REGULATIONS AND INTERNATIONAL TRADE CONTROL
6.05	PEOPLE'S SAFETY AND HEALTH	6.19	PROTECTION OF ASSETS AND ELECTRONIC COMMUNICATION TOOLS
6.06	SUSTAINABILITY	6.20	DATA PROTECTION AND PRIVACY
6.07	RESPECT FOR THE ENVIRONMENT	6.21	CYBERSECURITY
6.08	RESEARCH AND DEVELOPMENT	6.22	USE OF ARTIFICIAL INTELLIGENCE
6.09	BIOETHICS AND ANIMAL WELFARE	6.23	MISUSE OF CONFIDENTIAL AND/OR PRIVILEGED INFORMATION
6.10	QUALITY AND SAFETY OF OUR PRODUCTS AND SERVICES	6.24	CONFIDENTIAL INFORMATION AND TRADE SECRETS
6.11	COMMUNICATION AND PROMOTION OF OUR PRODUCTS AND SERVICES	6.25	RESPECT FOR INTELLECTUAL AND INDUSTRIAL PROPERTY
6.12	FAIR COMPETITION	6.26	SUPPLY CHAIN RESPONSIBILITY
6.13	CONFLICTS OF INTEREST	6.27	BUSINESS CONTINUITY AND CRISIS MANAGEMENT
6.14	PREVENTING CORRUPTION AND BRIBERY		



# COMPLIANCE WITH THE LAW



We are committed to acting in accordance with applicable local, national and international laws, rules and regulations in the countries in which we operate.

We promote a culture of transparency and accountability, where each individual is responsible for acting within the legal framework and reporting any violations or irregularities.

No HIPRA employee or collaborator shall knowingly participate with any third party in the violation of any law or engage in any action that compromises respect for the rule of law.

6.02

# RESPECT FOR HUMAN RIGHTS



In all of our activities, we advocate and promote respect for fundamental human rights enshrined in the United Nations Universal Declaration of Human Rights.

We are committed to not engaging in any form of exploitation or abuse, ensuring that our operations respect the dignity of all individuals involved in our supply chain, so that they work in safe, dignified, and fair conditions, and in work environments free from abuse, harassment, or any form of discrimination.



# EQUALITY, DIVERSITY AND NON-DISCRIMINATION



At HIPRA, we value diversity and inclusion in our team and we strive to create a work environment where all voices are heard and respected.

We implement policies that ensure equal opportunities in employment, promotion and professional development, without discrimination on the basis of gender, race, ethnicity, nationality, sexual orientation or identity, political opinion, religion, social origin, age, disability or any other reason provided for in current regulations.

We work to **prevent harassment** in the workplace, promoting a culture of respect and mutual support.

We reject any manifestation of physical, psychological or moral harassment or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment for people.





At HIPRA, we believe that **investing in the talent** and satisfaction of our employees **is key to our long-term success**.

The selection, remuneration, development, and promotion of personnel are carried out fairly, based on performance, competencies, abilities, knowledge, productivity, motivation, and merits.

We provide continuous opportunities for professional development and training, encouraging learning and continuous improvement.

Individuals in leadership positions at HIPRA are expected to support their team by sharing their knowledge appropriately, recognising individual efforts and facilitating their professional development.



# PEOPLE'S SAFETY AND HEALTH



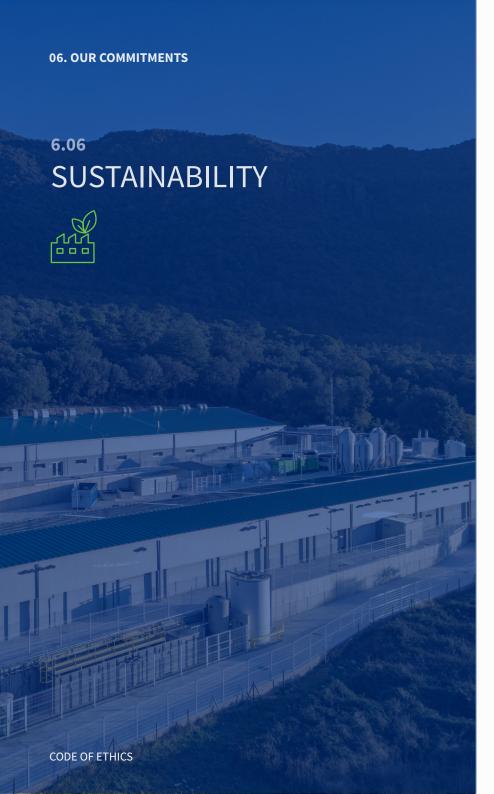
## The health and safety of our employees and third parties working at our facilities is a priority.

We implement rigorous occupational health and safety policies, ensuring that our workplaces meet the highest standards of safety and health.

We promote a culture of prevention, training and awareness of our employees about safe practices and comprehensive well-being, including physical and mental well-being.

We provide employees with the systems and resources necessary to carry out their work in a comfortable and safe environment.





We are committed to operating within the framework of sustainability, promoting responsible practices that minimise environmental impact and contribute to the well-being of current and future society.

At HIPRA, the Corporate Sustainability Strategy divides its activity into three key areas:

#### GO GREEN

which works on energy efficiency and operational water footprint, promoting the circular economy and savings in the use of resources. It also includes the fight against climate change.

#### GO PEOPLE

which studies the real impact of HIPRA on people, groups such as health and veterinary professionals and society. It also seeks, through this area, to establish legitimate and healthy labour relations in order to favour professional and human development.

#### **GO ETHICAL**

which seeks good governance within the organisation, aiming for excellence in the management of ethics and compliance.



# RESPECT FOR THE ENVIRONMENT



#### Respect for the environment is key for HIPRA.

We are committed to operating in a sustainable manner, minimising the environmental impact of our operations so as not to compromise present and future natural resources.

This involves complying with environmental regulations and adopting responsible practices that reduce our ecological footprint.

At HIPRA, we integrate environmental requirements into our normal work processes and raise awareness among our employees about saving natural resources, and reducing emissions, discharges and waste in our industrial activity in order to protect the environment.





We are committed to ensuring that the research and development of our products is carried out in a responsible manner, complying with the regulations applicable to each research site.

We invest in research and development of innovative solutions that not only improve the health of people and animals but are also environmentally sustainable.

Our approach is based on sound scientific principles and ethics, ensuring our products are safe and effective.

At HIPRA, we adhere to rigorous ethical principles in research, respecting good practices and applicable laws, both in our own R&D and in our collaborations with third parties.

In the case of human subjects, we ensure that those who participate in clinical trials are not exposed to unnecessary risks, understand the purpose of the research and give their informed consent to participate. Regarding animal experimentation, we ensure compliance with the principles of bioethics and animal welfare.

We are also committed to **being transparent in communicating the results** of clinical studies, in accordance with legal and regulatory requirements.



## BIOETHICS AND ANIMAL WELFARE



We are committed to treating animals with respect and dignity, as well as adopting best practices based on the principles of bioethics and animal welfare in all our research and production procedures. HIPRA does not tolerate animal abuse.

We ensure that animals are not used in our procedures when an alternative is available. If not, we work to minimise their numbers and support the development of non-animal testing techniques.

We also review and refine the entire process to **reduce the stress caused**. In addition, we take actions to recover the animals that have participated in the trials, always complying with the animal safety and welfare regulations.

We ensure that all studies involving the use of animals are previously approved by the competent authorities.



## QUALITY AND SAFETY OF OUR PRODUCTS AND SERVICES



The quality and safety of our products and services are our top priority. We implement rigorous quality controls at all stages of production and commercialisation.

We are committed to using the most advanced technologies to provide the safest and most effective products.

We are committed to complying with international regulations and to maintaining transparency about the composition and effectiveness of our products.

6.11

# COMMUNICATION AND PROMOTION OF OUR PRODUCTS AND SERVICES



Trust is a fundamental part of our work, which is why we are committed to ensuring that the communication, promotion and marketing of our products and services are carried out in an honest and transparent manner, complying with the Codes of Good Practice to which we adhere in the sectors in which we operate.

We undertake to provide clear, accurate, objective, complete and truthful information in our promotions and advertising, avoiding any type of deception or manipulation that may harm our customers, patients or society.





We are committed to complying with applicable antitrust laws where we operate and to avoiding unfair, anti-competitive, restrictive or distortive practices and abusive behaviour.

We encourage fair and just competition in the marketplace and promote a business environment in which innovation and creativity can flourish without resorting to unethical tactics.

Sharing sensitive information between competitors that could disrupt the rules of competition is prohibited. Gathering information through illegal or unethical means is also prohibited.



30

#### 6.13

## **CONFLICTS OF INTEREST**



We expect all our employees and partners **to act in the best interests of HIPRA** and to avoid situations that may give rise to conflicts of interest.

Conflicts of interest may arise in circumstances where the personal interests of HIPRA employees or partners, either directly or indirectly, may be contrary to or collide with the interests of HIPRA.

Personal interests must not influence our business judgement or decision-making.

Notification to the immediate supervisor is required for any potential conflict of interest that may influence decision-making





We adopt a zero-tolerance policy towards corruption and bribery, as they damage our values and the way we should conduct our business activities by relying on unethical and, in many cases, prohibited practices.

We are committed to acting with integrity in all our business dealings and not offering or accepting bribes in any form. Bribery is prohibited and no member of HIPRA, or any other person acting on our behalf, may offer or receive a bribe, whether to a public official, employees of private sector organisations or private individuals.

HIPRA promotes ethical and transparent business practices in all our interactions and not to improperly influence the behaviour of a third party to gain a commercial or other advantage.

#### **GIFTS AND HOSPITALITY**

Gifts and hospitality should always be modest and of a professional nature. We undertake to comply with the Codes of Good Practice to which we adhere and the regulations that apply to us, avoiding any situation that could be interpreted as an attempt to unduly influence business decisions.



# DONATIONS, GRANTS AND SPONSORSHIPS



Through direct engagement and collaboration with various organisations, HIPRA strives to develop and implement programmes to benefit at-risk groups.

Donations, grants and sponsorships will be made in a transparent and ethical manner, ensuring that there is no expectation of undue return. We will carefully assess the impact of our contributions on society and health, ensuring they are aligned with our corporate values.

6.16

## MONEY LAUNDERING AND TERRORISM FINANCING



We are committed to preventing all forms of money laundering and to **complying with applicable national and international** anti-money laundering and anti-terrorism financing regulations.

HIPRA expressly prohibits relationships with criminal organisations and groups (or entities suspected of being related to them) that may threaten order and security, as well as any monetary payments or offers of transactions with such organisations.



## RELIABILITY OF FINANCIAL REPORTING



For HIPRA, keeping accurate business records is essential to the management of the organisation and to protect and preserve shareholder confidence.

We maintain high standards of accuracy and transparency in financial reporting. All financial reports are prepared in accordance with applicable regulations and reviewed regularly to ensure their reliability.

6.18

# COMPLIANCE WITH CUSTOMS REGULATIONS AND INTERNATIONAL TRADE CONTROL

We are committed to complying with international customs and trade regulations, as well as to following regulations related to the import and export of products, ensuring legal and ethical operation in all markets.





## PROTECTION OF ASSETS AND ELECTRONIC COMMUNICATION TOOLS

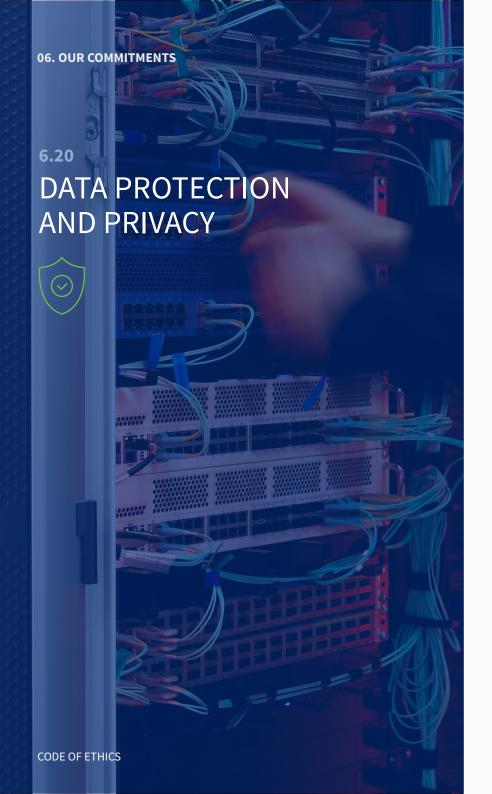


We are committed to protecting our assets, including data and electronic communication tools, against any misuse or unauthorised access.

We promote **secure practices** in the use of information technology and resources to safeguard the integrity of HIPRA and the confidentiality of information.

Employees and collaborators must use HIPRA's resources in a responsible, efficient and appropriate manner in the context of their professional activity, and must protect and preserve them from any inappropriate use that could be detrimental to HIPRA's interests or reputation.





We are committed to complying with personal data protection and privacy laws in all our operations.

We implement measures to ensure the confidentiality and security of the personal information of employees, clients, patients, healthcare professionals and veterinarians or other persons or entities with whom we do business.

Any personal data that HIPRA may collect will always be obtained with information about the reason for the request and the purpose for which the data is to be used. The data will only be used for the purposes for which it was collected. We undertake to process personal information only to the extent necessary, in a fair, transparent and secure manner.

HIPRA reserves the right to access and review—without prior notice—any physical or electronic files, emails, browser logs, or information stored on HIPRA equipment, systems, or resources used by its employees, so there should be no expectation of privacy regarding such information, and to conduct internal audits and backups to record the existence and location of this data.



### **CYBERSECURITY**



## Cybersecurity is critical to protecting HIPRA information and assets.

It is important for the organisation to protect digital information and technology systems from unauthorised access, alteration, theft, and any cyberattacks.

All employees and partners must act responsibly and follow best practices to ensure the security of sensitive data and digital infrastructure.

#### 6.22

# USE OF ARTIFICIAL INTELLIGENCE



We are committed to using artificial intelligence in an ethical, transparent and responsible manner, with the aim of improving human and animal health, always prioritising the safety and privacy of our users.

We take a human oversight approach in all key decisions, avoiding bias and ensuring compliance with applicable regulations. Technology innovation will be implemented with a responsible approach and for the benefit of public health.



## MISUSE OF CONFIDENTIAL AND/ OR PRIVILEGED INFORMATION



Confidential and/or proprietary information is a valuable business asset for HIPRA and must be protected and not misused by our employees and partners.

We prohibit the misuse of confidential and/or privileged information for personal gain or for the benefit of others.

All employees must avoid actions that could be interpreted as insider trading or any practice that compromises the integrity of our business.

6.24

## CONFIDENTIAL INFORMATION AND TRADE SECRETS



**At HIPRA, we will protect confidential information and business secrets.** All employees are responsible for protecting this information and preventing its unauthorised disclosure, ensuring that HIPRA's competitiveness in the marketplace is not compromised, consistently applying a criterion of prudence, reserve and confidentiality.



## RESPECT FOR INTELLECTUAL AND INDUSTRIAL PROPERTY



We respect the intellectual and industrial property of others and take steps to protect our own property rights. This includes patents, trademarks and copyrights, as well as the experience, scientific and technical knowledge and know-how developed at HIPRA, ensuring that our innovations and creations are protected and recognised.

6.26

## SUPPLY CHAIN RESPONSIBILITY



We are committed to managing our supply chain responsibly, ensuring that all links meet our ethical and sustainability expectations. This includes conducting audits and collaborating with our partners to continuously improve.

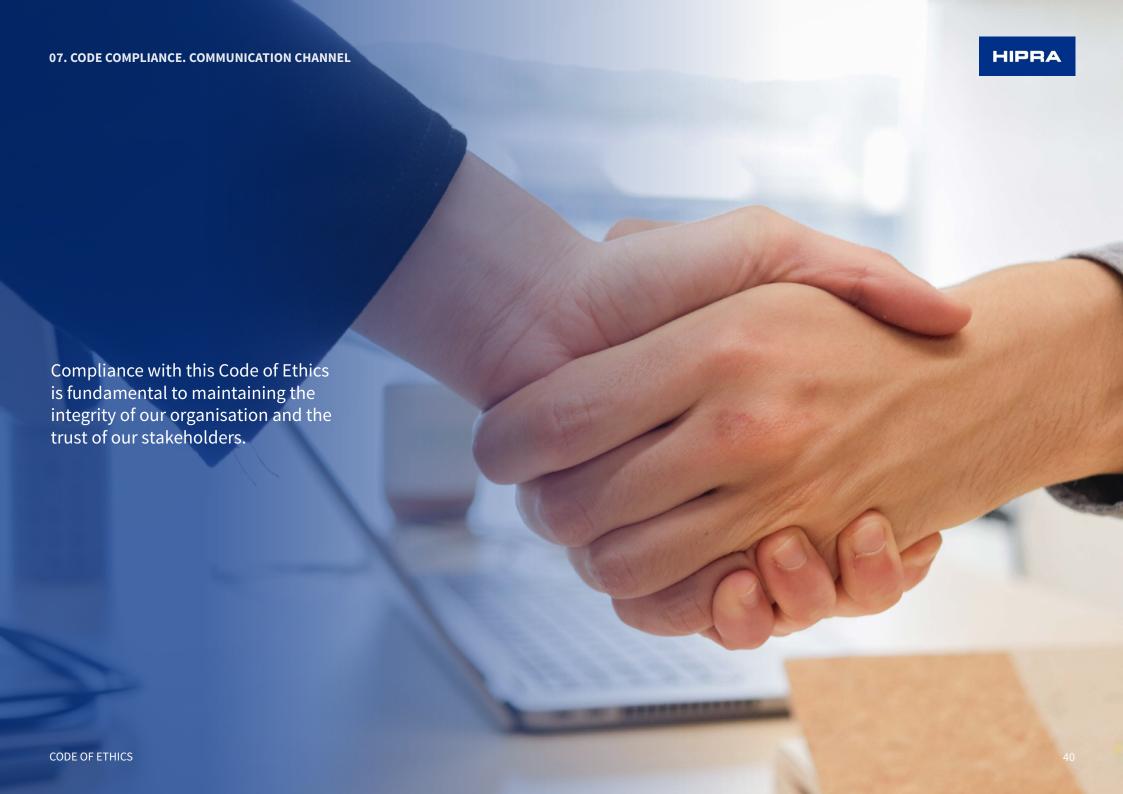
6.27

# BUSINESS CONTINUITY AND CRISIS MANAGEMENT



We develop business continuity plans to ensure resilience to crises. **We implement crisis management practices** to minimise the impact of adverse situations, protecting our stakeholders.







It is forbidden to ask a HIPRA employee or collaborator to carry out any act that contravenes the provisions of this Code of Ethics.

Failure to comply with the Code of Ethics will be subject to evaluation in accordance with HIPRA's internal regulations, legislation and agreements in force, adopting, where appropriate, the disciplinary or other labour measures determined in accordance with the system of misconduct and penalties provided for in the corresponding sanctioning system or, failing that, the regulations applicable in each country, and HIPRA may also take legal action.

In order to foster an environment of transparency and accountability, **HIPRA** has established a channel for communication of violations, the Speak Up Channel, to report behaviours that it considers to be contrary to the principles established in this Code. This channel is accessible via the HIPRA corporate website and the corporate intranet.

HIPRA commits to investigating reports received through the enabled communication channel.

Retaliation against those using this channel to raise concerns or report breaches in good faith will not be tolerated.

We will not tolerate communications or reports made in bad faith, with false information or maliciously carried out with the aim of damaging HIPRA, its employees or third parties.

It is our duty to collaborate and be proactive in maintaining an ethical environment. Open and honest communication is key to the success of our commitment to compliance with the Code of Ethics.

HIPRA provides its stakeholders with the email address (compliance@hipra.com) as a channel for raising any questions regarding the interpretation of the Code of Ethics.

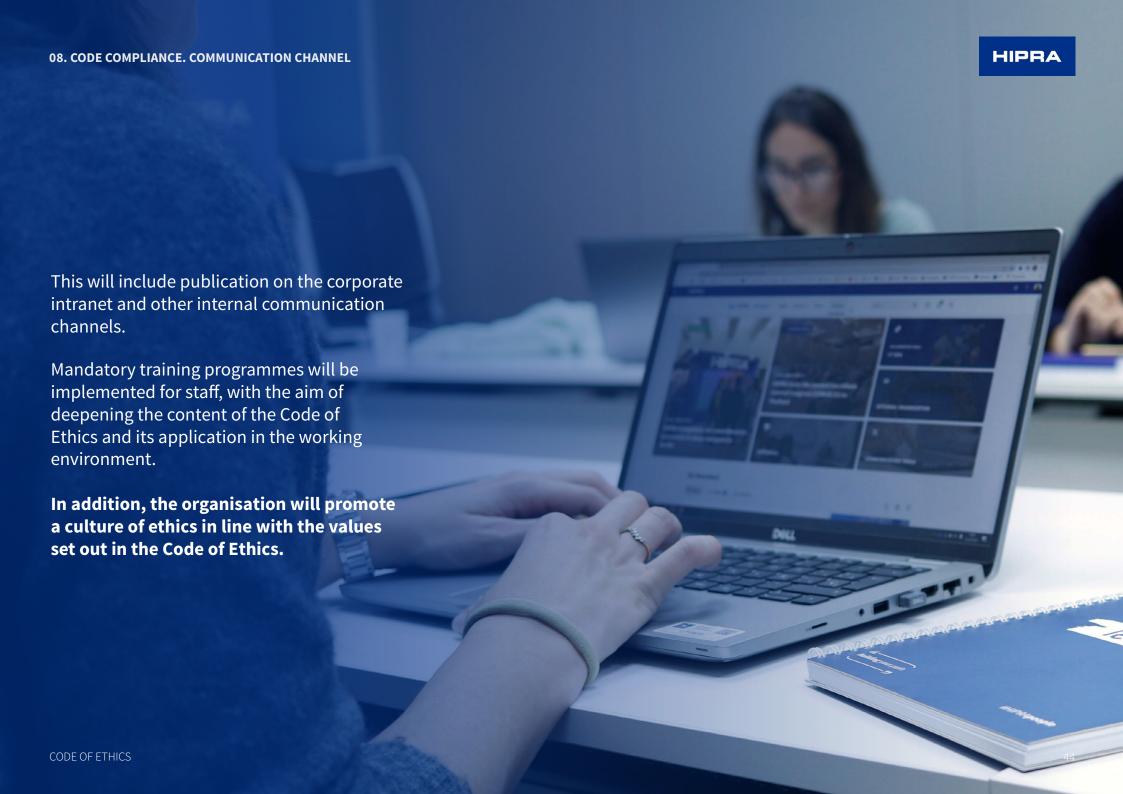




Dissemination, training and awareness of the Code of Ethics are essential to ensure that all members of the organisation understand and adopt its principles and standards.



In this regard, it shall be ensured that the Code of Ethics is available and accessible to everyone in the organisation.







This Code of Ethics shall come into force from the date of its approval and shall remain in effect indefinitely until it is reviewed or repealed.

Reviews and updates of the Code of Ethics will be conducted periodically, taking into account significant changes in applicable regulations, organisational structure, or the ethical practices guiding our activities.

Any changes will be communicated to all members of the organisation to ensure everyone is informed and aligned with the updated provisions.

Final approval of each update shall be granted by the management body or the competent authority designated by the management body.

