

Failure to comply with this Code of Conduct may be punishable in accordance with the Company's disciplinary system.

Code of Conduct



LETI
Pharma

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Message from the Sole Director

At **LETI Pharma, S.L.U.** (hereinafter, **LETI Pharma** or the "Company" interchangeably) we strive to contribute to improving people's health and well-being. The mission of **LETI Pharma** is to contribute to the health and well-being of society through the One Health concept (human, animal and environmental health).

Being responsible for our health and the impact of our actions on the environment can significantly help to improve quality of life and reduce the social cost of disease.

With that in mind, we invest in the research and development of new products aimed at disease prevention and treatment, early diagnosis and skincare.

Our purpose is to pursue excellence, not only in our products and services, but also in the way we relate to our environment.

At **LETI Pharma**, what we do and, particularly, how we do it is key. For this reason, as Sole Director and Chief Executive of the Company, I feel it is my duty to establish a Code of Conduct and to adopt the necessary measures to ensure its maximum dissemination and compliance by all **LETI Pharma** employees as well as third parties with whom we interact.

LETI Pharma strives to be recognized as a responsible and, above all, ethical, respected and respectable Company. As such, we ask all our national and international employees, suppliers, customers and, in general, all those with whom we interact, to comply with this Code of Conduct, to undertake to follow it, respect it, enforce it and be aware that, in addition to being a set of guidelines, it is a tool that will help us build a more productive, participative, efficient and cohesive work environment, contributing to sustainability and professional ethics.

This Code is the foundation on which our corporate ethical culture is based, principles that guide us in everything that we do.

Jaime Grego Sabaté

Sole Director of **LETI Pharma**

1. Scope of application

This Code of Conduct applies to **LETI Pharma** and all the companies in the LETI Group worldwide, to all its partners, employees and suppliers and to the Management Committee and the Sole Director.

Similarly, at **LETI Pharma** we trust that partners, employees, patients and consumers, health care professionals, animal health professionals, veterinarians, customers, suppliers, institutions and entities in the chemical and pharmaceutical sector, health authorities and, in general, people with whom we interact (hereinafter referred to collectively as "Stakeholders") apply these principles and adopt conduct aligned with that set forth in this document.

The objectives of **LETI Pharma** with regard to our business environment and Stakeholders, are outlined in the following commitments:

Patients and consumers

We are committed to the safety, quality and efficacy of our products to serve patients and consumers. We place patients at the heart of our current and future work and projects, supplying products and services that provide significant therapeutic value and improve quality of life.

We abide by the codes of good practice applicable to our relationship with patient associations.

Human health care professionals

We comply with the codes of good practice applicable to the promotion of drugs and medical devices and with the existing legislation in this sector in the different countries in which we operate.

We ensure that the information we provide to health care professionals about our products is truthful and transparent and has been approved by the competent authorities where required.

Animal health professionals

We comply with the codes of good practice applicable to the promotion of drugs and products for the health and treatment of animals and with the existing legislation in this sector in the different countries in which we operate.

We ensure that the information we provide to animal health professionals about our products is truthful and transparent and has been approved by the competent authorities where required.

Suppliers

We choose suppliers based on objective criteria, including the quality of the product or service offered, reputation and responsiveness, and we place value on the fact that they have certified manufacturing processes and management systems, such as quality management, good manufacturing practices, environmental management and workplace hazard prevention policies.

The Company will use its best efforts and take the necessary measures to prevent any form of corruption when dealing with suppliers.

Institutions and entities in the chemical and pharmaceutical sector

We support and work together with industry institutions, joining forces to develop a sector that contributes to serving society in the best way possible.

Health authorities and officials

LETI Pharma operates within a highly regulated sector and, as a consequence, in order to carry out our work, some of our employees must interact with government health authorities or public officials. These relations must be based on honesty and integrity, in strict compliance with anti-corruption legislation and regulations, maintaining an open, fluid and honest dialog with the different public authorities and providing the required information within the established time frame.

Partners

We regularly and transparently inform our partners about our activity, performance and financial statements so that they can properly assess the Company's situation.

Civil society

At **LETI Pharma**, we are mindful of social, ethical, environmental and consumer concerns in Company operations in order to provide maximum value within the Company and, at the same time, minimize possible adverse impacts.

In order to respond to these collective concerns, it is fundamental that we maintain an open dialog with different civil society organizations and undertake social, environmental and cultural projects providing solutions to the demands of society, with a firm commitment to promoting Corporate Social Responsibility projects.

2. Purpose of the Code of Conduct

The purpose of this Code is to establish the principles that guide the professional, ethical and responsible conduct of all **LETI Pharma** employees, third parties and Stakeholders.

This Code of Conduct is the foundation on which our policies, principles and philosophy are built and, as a result, this Code of Conduct does not replace pre-existing internal **LETI Pharma** policies, guidelines or regulations (available in the Public Area of the intranet). Any internal regulations or guidelines implemented prior to the creation of this document will instead be interpreted or adapted (if necessary) in accordance with the letter and spirit of this Code of Conduct.



3. Conduct

RESPECT FOR LEGALITY, FUNDAMENTAL RIGHTS AND INDIVIDUALS

Respect for legality is the guiding principle of our work. We foster a work environment based on respect and equal treatment, acting with full respect for human rights and civil liberties and in accordance with the applicable regulatory framework.

We expect all employees and Stakeholders to:

- ✓ Comply with the applicable legislation and internal regulations of **LETI Pharma** in order to minimize any possible risk.
- ✓ Respect the dignity of business partners, employees, patients, health professionals, veterinary professionals, customers, suppliers and competitors, treating them fairly and without discrimination and promoting a good working environment.
- ✓ Avoid, communicate and report any violation of the principles of non-discrimination, equal opportunity and equal treatment (e.g., harassment or bullying) or violation of the principle of respect for fundamental rights (e.g., if you become aware of the use of child labor).

DATA PROTECTION AND RESPECT FOR PRIVACY

The privacy of individuals and their personal data are fundamental rights to be upheld and protected, especially in an ever-changing digital environment.

We expect all employees and Stakeholders to:

- ✓ Respect the right to privacy of individuals and current regulations on data protection, adopting the appropriate technical and organizational measures.
- ✓ Be aware of and respect the regulations, policies and procedures established for data protection, privacy and information security during the course of their work.
- ✓ Not disclose personal data if they have access to it as part of their duties within the Company, ensuring its confidentiality and the trust that has been placed in them to perform such work.
- ✓ In the event of any concerns about data protection and, in particular, before sharing personal data with external entities or transferring personal data to a country outside the EU and if you become aware of security incidents and breaches, such as unauthorized access, theft, loss or unauthorized disclosure, contact the Data Protection Officer at the following address: dpo@leti.com

PROTECTION OF HEALTH AND SAFETY AT WORK

To protect the health and safety of all employees and to ensure maximum safety at our facilities.

We expect all employees and Stakeholders to:

- ✓ Comply with occupational health and safety and hazard prevention standards. Non-compliance may endanger individuals and result in significant civil and criminal penalties, both for individuals and for the Company.
- ✓ Use the equipment assigned to them in a responsible manner, especially when performing high-risk activities.
- ✓ Not endanger the health and safety of employees or third parties, adopting the necessary measures.

Not take risks that could endanger the health or integrity of employees.

- ✓ Immediately respond to and report any accident, incident or dangerous conduct that poses a threat to the health or safety of employees or third parties.

Not perform activities for **LETI Pharma** under the influence of alcohol or drugs.

- ✓ Consult the Compliance Committee as soon as possible in case of any doubt as to whether an action may or may not involve some type of risky activity.
- ✓

RESPECT FOR THE ENVIRONMENT

We conduct our business in accordance with applicable legislation, taking steps to reduce our environmental impact.

We expect all employees and Stakeholders to:

- ✓ Be familiar with the Quality and Environmental Management Systems Manual as well as applicable internal environmental management commitments and processes.
- ✓ Make efficient use of the resources at their disposal.
- ✓ Be aware of measures concerning waste disposal and minimize the environmental impact of their work, reducing the consumption of natural resources, energy and water, among others.
- Report any accident or incident that poses a threat to the environment or that has caused any impact.
- ✓ Consult the Compliance Committee as soon as possible in case of any doubt as to whether an action may or may not involve any type of prohibited activity.

RELIABILITY OF FINANCIAL AND ECONOMIC INFORMATION

Transparency and good governance are the principles that govern our financial statements.

We expect all employees and Stakeholders to:

- ✓ Carry out the process of accounting, recording and proper and complete documentation of all transactions, income and expenses at the time they occur, without omitting, concealing or altering any data or information, so that accounting and operating records accurately reflect true circumstances and can be verified by monitoring departments and auditors.
- ✓ Perform their functions and tasks in a manner that allows them to correctly and punctually record all of the business' financial information in the accounting system, in a truthful manner and in strict compliance with the law.
- ✓ Act honestly, transparently and cooperatively in the event of an investigation by any public administration or authority, or by our auditors, in accordance with applicable internal procedures and with the due legal or internal financial support.
- ✓ Consult the Finance and Administration Department or the Compliance Committee in case of any doubt about the correct recording of data or as to whether an action may or may not involve any type of prohibited activity.



PROTECTION OF CONFIDENTIAL INFORMATION, KNOW-HOW AND INDUSTRIAL AND INTELLECTUAL PROPERTY

Confidential information, know-how, patents and industrial and trade secrets are invaluable and highly sensitive assets owned by the Company and key to commercial success. All employees and third parties must protect and not make improper use of this information.

We expect all employees and Stakeholders to:

- ✔ Treat any **LETI Pharma** information with the utmost confidentiality and comply with the duty of confidentiality.
- ✔ Use Company-owned data, information and resources for the proper conduct of business and not for personal gain or any other fraudulent purpose.
- ✔ Not share information with third parties without ensuring that a confidentiality commitment or agreement is in place.
- ✔ In their relations with third parties, not communicate important information that is not in the public domain for their personal benefit or that of connected persons or third parties.
- ✔ Pay special attention to the unauthorized use of material (texts, images, etc.) that are not of their own creation and verify that the appropriate authorization or right for their use has been previously obtained.
- ✔ Use Company information only for purposes related to **LETI Pharma**.
- ✔ Consult the Compliance Committee in case of any doubt as to whether or not an action may or may not involve any type of prohibited activity.

CONFLICT OF INTEREST MANAGEMENT

Safeguarding the common interests of LETI Pharma that may be contrary to the personal interests of all employees. Acting with integrity and objectivity in decision making.

We expect all employees and Stakeholders to:

- ✔ Be loyal to the Company, avoiding conflicting situations stemming from a clash of personal interests and those of **LETI Pharma**.
- ✔ Inform the Company and refrain from participating in recruitment and/or decision-making processes when persons or entities with whom they have a personal, family or emotional relationship are involved, or when they are hierarchically dependent on another person and this process or decision may collide with the interests of **LETI Pharma**, in accordance with applicable internal Company regulations for managing conflicts of interest.
- ✔ Not abuse their position within the Company for personal benefit or for the benefit of connected persons, family members or close associates.
- ✔ Never accept or offer gifts if this could compromise their independence, affect their decision-making capacity or serve as a reward in favor of the interests of a third party.
- ✔ Consult their immediate superior, the Legal Department or the Compliance Committee as soon as possible in case of any doubt as to whether they are in a situation of conflict of interest and before engaging in any type of prohibited activity.



LetiFend®



PROHIBITION OF BRIBERY AND CORRUPTION

We reject any form of bribery or active or passive corruption with private individuals or Public Administration personnel in any country in which we operate.

We expect all employees and Stakeholders to:

- ✓ Refrain from accepting or offering gifts, invitations or benefits of any kind (except for merchandising or those that are within the limits of established Company practice) aimed at obtaining contracts, a commercial advantage and/or business in an artificial manner from suppliers and customers, public officials or private individuals that could compromise **LETI Pharma**.
- ✓ Act in a transparent and open manner in accordance with **LETI Pharma** guidelines and the codes of good practice applicable to the sector in which we operate, in order to minimize any possible risk.
- ✓ Consult the Compliance Committee as soon as possible in case of any doubt as to whether an action may or may not involve any type of prohibited activity.



**EXPERTO EN EL CUIDADO
DE LA PIEL ATÓPICA**

ETHICAL AND RESPONSIBLE PRODUCT PROMOTION

We uphold the highest ethical standards in the promotion of our products.

We expect all employees and Stakeholders to:

- ✓ Be aware of and apply the principles and rules of product promotion. **LETI Pharma** has a framework of principles, rules and standard operating procedures applicable to drug promotion practices.
- ✓ Promote **LETI Pharma** products and services in an ethical, objective, transparent, balanced and unequivocal manner, in accordance with industry codes and applicable regulations and legislation.
- ✓ Consult the Legal Department or the Compliance Committee in the event of any matters related to compliance with the legality of product promotion practices.

RESPECT FOR FREE COMPETITION

We act in accordance with the principles of fair and free competition.

We expect all employees and Stakeholders to:

- ✓ Comply with national and international competition, antitrust and consumer rights legislation.
- ✓ Not exchange sensitive information with competitors or engage in discussions that may involve anti-competitive behavior or that are intended to prevent or restrict competition (such as price fixing, market sharing, involvement in the creation of a monopoly).
- ✓ Avoid conversations and agreements with competitors with the aim of coordinating behavior in the market, abusing power, having a dominant position in the market or rigging bids.
- ✓ Within their capacity to act, develop adequate professional diligence, avoiding practices or conduct with a tendency to alter or fix market conditions and obtain some type of advantage in an illegal manner.
- ✓ Act with due diligence in the processing of information that may be considered sensitive or of a confidential nature.
- ✓ Consult the Legal Department or the Compliance Committee in the event that clarification is required on an unclear matter.
- ✓



RESEARCH AND DEVELOPMENT: ETHICS IN CLINICAL RESEARCH

Our mission is to contribute to increased health and well-being for society through the One Health concept.

We expect all employees and Stakeholders to:

- ✔ Record and store information on clinical research in accordance with the law, ensuring the rights and integrity of study and research participants as well as the welfare of animals used in research processes.
- ✔ Ensure that no person participating in a clinical trial is exposed to unnecessary risk, that they understand the purpose of the research and have given consent to participate.
- ✔ Be transparent in the disclosure of the results of the clinical studies carried out, without omitting relevant data.



PRODUCT SAFETY AND QUALITY

We ensure that our products meet rigorous quality standards and applicable legal and regulatory requirements. We strictly adhere to current product safety regulations, including human and veterinary pharmacovigilance, cosmetovigilance and medical device surveillance.

We expect all employees and Stakeholders to:

- ✔ Understand and apply product quality and safety standards and procedures, including human and veterinary pharmacovigilance, cosmetovigilance and medical device surveillance.
- ✔ Report any possible adverse effects relating to our products through the established procedures as well as any problems related to the quality, safety or efficacy of our products, making use of the means indicated for this purpose.

4. Whistleblowing Channel

All **LETI Pharma** employees must comply with the spirit and letter of this Code of Conduct and help others to do the same.

Please contact your immediate supervisor, Human Resources or a member of the Compliance Committee via the Whistleblowing Channel if you have any questions about applicable rules or regulations or about **LETI Pharma's** policies and procedures, or a concern about a possible violation thereof. It is important that you report it as soon as possible.

You may communicate your concern or question anonymously if you wish. Please read the Whistleblowing Policy document available on the **LETI Pharma** website.

LETI Pharma will not tolerate retaliation of any kind against those who, in good faith, have reported a violation of applicable laws, rules and regulations or of **LETI Pharma's** internal policies and procedures. Any retaliation may result in disciplinary action including dismissal.

5. Approval and validity

This Code of Conduct was approved by the Sole Director of **LETI Pharma** on July 28, 2023, and shall come into effect on the same date.

The Compliance Committee will review it and, if necessary, update it periodically, taking into account the commitments made by **LETI Pharma**, the proposals of employees and the regulatory or legislative changes that make its modification necessary.

Any new version of this Code shall be approved by the Sole Director and communicated to all employees and third parties.

Failure to comply with this Code of Conduct may be punishable in accordance with the Company's disciplinary system.



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Date of approval of the Code: July 28, 2023

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Body/Person in charge of approving the Code: Administrative Body

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