

***Anti-Bribery, Anti-Corruption, AML
(AntiMoney Laundering) Policy***

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APPROVALS

Departments	Approval Date	Name and last name	Signature
Chairman of the board of directors	11.07.2023	Arturo Gómez Kuster	
VP Corporate finance	11.07.2023	Antonio J. García De Castro	
VP Corporate finance	19.08.2022	Antonio J. Garcia De Castro	APROBADO
VP Corporate finance	18.10.2021	Antonio J. Garcia De Castro	APROBADO
Legal	18.10.2021	Giovanni Di Venere	APROBADO
Finance	18.10.2021	Pedro Pinto	APROBADO

CHANGE CONTROL

Person(s) Responsible	Changes	Version Change and Date
Corporate finance	Incorporation of money laundering and any other financial crime	V02. 03.08.2022
Corporate finance	Incorporation of aspects suggested by the consulting firm Deloitte as part of the project to Strengthen Corporate Governance Committees: Table of approvals and compliance measures. Update of the document code, it goes from POL-TC200 to POL-COR200.	V03. 11.07.2023

OBJECTIVE

To establish a framework for all GRUPO FARMA's employees who must comply with laws, regulations and corporate guidelines related to the risks of corruption, bribery, fraud, money laundering and any other financial crime.

SCOPE

GRUPO FARMA is guided by its Code of Ethics through which corruption is inadmissible. Furthermore GRUPO FARMA has a firm and irrevocable commitment to legality and ethical principles that are manifested against corruption, bribery, fraud, money laundering and any other financial crime.

GRUPO FARMA not only categorically rejects any corrupt, bribery, fraud, money laundering and any other financial crime, but also demands the prevention and elimination of corruption and a commitment to conducting business with honesty, integrity, responsibility and confidentiality.

WHO DOES IT PERTAIN TO

It applies to all employees at GRUPO FARMA.

At GRUPO FARMA we have relationships with clients, suppliers, patients, medical institutions and other organizations in the pharmaceutical sector and therefore we count on third parties that we work with to also comply with laws and with ethical business practices.

GENERAL CONCERNS

Corruption, bribery, fraud, money laundering and any other financial crime can happen anywhere and in any company.

In addition to being illegal and contrary to our policies, corruption, bribery, fraud, money laundering and any other financial crime are harmful to Society in general (patients, families, friends, communities and ourselves).

GRUPO FARMA educates its employees and business allies so they know how to recognize the potential signs of bribery, corruption, fraud, money laundering or any other financial crimes. Furthermore, they know the correct measures to take to refuse such behavior. Open communication is essential to expressing doubts and concerns that arise, even if one is not completely sure that there is a problem.

GRUPO FARMA offers its employees an ethics hotline to report, denounce, or address any identified situations related to corruption, bribery, fraud, money laundering, or other financial crimes that require clarification.

POLICY

GRUPO FARMA has zero tolerance for any form of corruption, bribery, fraud, money laundering and any other financial crime. GRUPO FARMA actively evaluates risks, standards, and trains employees who work in high-risk areas.

To achieve these objectives, GRUPO FARMA assumes and promotes the following basic regulations:

- We do not tolerate corruption, bribery, fraud, money laundering and any other financial crime, even if we might lose business.
- We do not give or accept bribes, nor do we allow third parties to do so on our behalf.
- We act in accordance with the laws, regulations, and ethical principles.

To that effect GRUPO FARMA:

- Complies with the laws and regulations related to anti-corruption and anti-bribery that are enforced in the countries where GRUPO FARMA operates. GRUPO FARMA also requires that our contractors and suppliers do the same.
- Conducts our business fairly and legally, without seeking or accepting any illegal or dishonest business, personal and/or corporate advantage. Thus we reject direct or indirect behavior such as but are not limited to the following:
 - Offering, giving or promising a bribe
 - Receiving, soliciting or accepting a bribe
 - Authorizing another person to do any of what is listed above, including third parties with whom we work with
 - Influencing or rewarding a public official in order to expedite or obtain a specific result and/or decision

- Rewarding or giving kickbacks to our customers and/or suppliers who choose to do business with GRUPO FARMA
- Compromising or influencing the independent decision making of any individual
- Securing an inappropriate business and/or personal advantage
- Makes payments only through the legal financial system, such as a wire transfer to a legitimate business account, check, and/or company credit card. GRUPO FARMA does not make "off-shore" payments to any account.
- Records payments accurately with legal books and records.
- Does not pay in cash, unless approved by Finance.
- We do not accept that a third party makes a payment in their name unless: 1st it is a legitimate, genuine business and there is a need for it to be done, 2nd there is a written agreement with the third party to document and track said payment.
- When legally required or officially authorized, the company makes payments (taxes, permits, licenses, inspections, or other official fees, for example) to government agencies and NOT to an individual public official.
- We do not make facilitating payments (unofficial payments to influence decisions that a public official has the power to carry out), unless there is a reasonable fear for a person's imminent safety and that there is no other safer alternative.
- If someone requests or demands a facilitating payment, the Ethics Committee must be informed of the situation as soon as possible and must follow up immediately with a written report.

In case of non-compliance with this policy, by any collaborator of GRUPO FARMA, the provisions of the Corporate Compliance Policy will apply.

In the same way, the ignorance of this policy does not exempt the collaborator from its compliance.

GLOSSARY

Something of Value: cash, gifts, entertainment, meals, hotel accommodations, travel expenses, loans, donations, and/or sponsorships.

Employee: Term used for someone who works at GRUPO FARMA.

Fraud: Fraud is defined as the use of deception with the intent to obtain an advantage, avoid an obligation, or cause a loss to another party.

Corruption: Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery. The concept, according to the dictionary of the Royal Spanish Academy (RAE), is used to name vice or abuse in a writing or in non-materials.

Bribery: Bribery is defined as the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty

Money laundering: Money laundering is the process through which the origin of the funds generated through the exercise of some illegal activities is concealed (the most common being drug or narcotic trafficking, arms smuggling, corruption, fraud, human trafficking, prostitution, extortion, piracy, tax evasion and terrorism). The objective of the operation is to make the funds or assets obtained through illegal activities appear as the result of legitimate activities and circulate without problem in the financial system.

