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## 1. PRESENTATION

The Board of Directors of Icon Group has approved this Code as an own procedure in which everyone must respect the basic principles of behavior and ethical standards.

This Code of Ethics represents an obligatory action guide that develops the basic ethical principles, so activities undertaken in the professional environment complies with the principles of legality, integrity and transparency, in accordance with the values of our company.

## 2. SCOPE

The Icon Group's Management Body has approved this Code of Conduct. Its fulfillment is required for its managers, employees and external collaborators ("the people"). All of them are obliged to know it, to respect the principles herein and to comply with it according the internal established procedures for the better functioning of the company.

In addition, Icon Group's employees will be required to know and comply with both client's Code of Conduct and client's industry association Code of Conduct, in each individual project that Icon Group's staff undertakes:

- Farmaindustria's Code of Good Practices for the Pharmaceutical Industry.
- Spanish Generic Medicines Association (AESEG).
- Medicines For Europe (Former EGA).
- FENIN Code of good business practice (Health technology market federation).
- Any other Code of Conduct declared by the client

### 3. AWARENESS AND COMPLIANCE

The people are linked by the Code of Conduct. This will be given or made available to the people so they can know it and raise the issues that may arise from its interpretation.

Compliance with the Code of Conduct is mandatory for the people, who must respect it in the exercise of their professional activity. If any of the principles or norms included in the Code of Conduct are found to be contradictory or incongruent, the Supervisory and Control Body should be informed for its consideration and, if appropriate, to ask the Governing Body to amend the aspects which it deems appropriate.

### 4. FUNDAMENTAL PRINCIPLES AND VALUES

#### 4.1. Compliance with applicable legislation

The people must respect and comply with the regulations that apply to their field of professional activity. In particular, and due to the regulation of the industry, regulations related to distribution of medicines, sanitary products, cosmetics and food supplements must be fully complied with.

#### 4.2. Integrity and transparency

Activity carried out by the Icon Group with its clients requires that management and other professional performance actions must be governed at all times by the principles of honesty, clarity and transparency.

#### 4.3. Respect, dignity and non-discrimination

The behavior of the people of the Icon Group will be governed by the respect for both other workers and third parties. Under no circumstances will be allowed neither lack of respect nor hostile attitudes in the area of the professional relationship.

Dignity of the people, as well as the absence of personal and professional discrimination, are configured as two fundamental principles that must govern the behavior of all people.

## 5. Standards of conduct

### 5.1. Protection of privacy and personal data

The people of Icon Group are obliged to respect the privacy of all employees as well as of any other individuals whose information access derive from the professional activity. Personal data management must follow the established channels, taking into account the general principles of use and compliance with internal procedures. Compliance with the procedures and manuals developed in accordance with the data protection regulations is mandatory for the people of the Icon Group.

Based on the same fundamentals that govern data protection regulations and with the aim of both developing an effective work to promote information security, and designing the strategy for the effective implementation of Security at all levels. hierarchical, our entity has developed the Security Policy that will be applicable to all its workers and facilities, committing to compliance with the following principles:

The protection of Corporate Information and the Resources necessary to create, maintain and use it, must be a constant in the daily work for all of us who work in this company and especially that of those who, at one level or another and at one level or another. job, exercise command functions.

Because we consider that Corporate Information is the most important asset of our company, we want to establish a preventive policy that goes towards a scientific, comprehensive, integrated and participatory Computer Security model.

Based on the principle that all threats and vulnerabilities can and should be avoided, the company is committed to achieving a high level of Safety at work, not only limiting itself to complying with current legislation on the matter, but also carrying out actions that raise the degree of protection of their Resources and Information Assets established by law if necessary. This commitment will be clearly expressed and will be one of the essential points marked in the general policy of the company.

In order to promote safe behavior in the activities carried out, workers will be provided with all the existing information on the risks in terms of data protection inherent to their work, as well as the necessary training on the means and measures to adopt for their correct prevention.

In the same way, the participation of all workers in matters related to the protection of company data is promoted, since they are the ones who know the details of the tasks they perform in greater depth, and therefore are the most indicated to brainstorm the safest way to do it.

To achieve an effective implementation of the data protection policy, the necessary resources are allocated and their use is planned appropriately.

Finally, it is the firm commitment of this company to integrate data protection into the organizational structure of the company, thus seeking more than the mere fulfillment of certain requirements of a basically documentary nature.

ICON GROUP provides all its staff with training on Data Protection that allows them to:

- Know the privacy of all the personal data to which they access and, therefore, their obligation to keep this information secret.
- Use the data only for the purposes for which it was collected.
- Do not disclose the passwords they have to access both computer systems and files containing personal data.
- Request the necessary authorizations for the processing of said data whenever they refer to outputs or inputs of computer media-
- Do not use the company's computer systems for private purposes, without authorization from the entity.
- Likewise, guidelines are provided for the use of the Internet, email and telephone, user accounts, equipment passwords, backup copies
- Storage and destruction of both paper and computer documentation
- Use of computer and documentary supports outside the entity's facilities
- Action before a request for the exercise of rights by the owner of the personal data.
- Notifications of incidents or security breaches by the worker.

## 5.2. Confidentiality

Confidential data held by the Icon Group and related to customers, suppliers, employees or third parties, must be treated in compliance with contractual confidentiality agreements to which they are subject, and in any case, according to the Data protection applicable regulation. Individuals handling confidential data have the responsibility of granting it custody and appropriate use.

Confidential information and documentation of Icon Group is considered a fundamental asset and it is not allowed its misappropriation.

The duty of confidentiality will subsist even when the employment relationship has ended.

### 5.3. Gifts and hospitalities

In order to avoid encouraging the prescription or administration of prescription drugs, it is prohibited to offer or delivery (direct or indirect) to health professionals of any kind of incentive, bonus or gift (in cash or in kind). It will be excluded from the previous prohibition, the offer or delivery of utensils for medical or pharmaceutical practice or desktop items that are not related to a prescription drug and its price in the market does not exceed 10 €.

The people should not accept (direct or indirect) accept gifts, invitations or any kind of compensation that come from customers, suppliers or competitors, or third parties that exceed the limits of social courtesy.

### 5.4. Relation with customers and third parties

The people of Icon Group must respect the principle of transparency and are obliged to ensure that no action undertaken by them can be interpreted as a deception to the detriment of customers, suppliers or third parties.

Any claim of a client or a third party must be processed according to the internal procedure, documented and answered in an appropriate manner and by the person or body designated for the purpose.

Individuals of Icon Group shall not offer, promise, deliver, or receive any kind of gift or form of bribery or unjustified commission to/from third parties. Acts of bribery, which are expressly prohibited and punishable, include the offer or promise (direct or indirect) of any type of advantage or the use of any instrument for its cover-up.

Gifts or hospitalities will not be offered or given to companies or institutions with which Icon Group is related and might appear to improperly influence their decision processes or the relationship itself.

### 5.5. Relation with authorities and public servants

Individuals of Icon Group shall not offer, promise and deliver any type of gift or form of bribery or unjustified benefit to officials, authorities or third parties. Acts of bribery, which are expressly prohibited and punishable, include the offer or promise (direct or indirect) of any type of advantage or the use of any instrument for its cover-up.

Gifts or hospitalities will not be offered or given to persons or institutions with which Icon Group has a relationship and might appear to improperly influence their decision processes or the relationship itself.

Persons who have a relationship with any authority or public officials that may influence some aspect of the company, should avoid influencing (direct or indirect) any decision making affecting Icon Group.

### 5.6. Relations with political parties

It is prohibited to make any type of donation to political parties, their foundations or federations, on behalf of Icon Group or use their funds to finance a political party (direct or indirect).

### 5.7. Relations with other companies

Relationships with competing companies must be loyal and be governed by the principle of respect for the business of the third party. The people of Icon Group are obliged to ensure the confidentiality of any kind of confidential or sensitive information of other companies, to which it has legitimate access and within the framework of negotiations or business relationships.

No worker who joins Icon Group may use confidential or secret documentation obtained from his previous employment. This illegal use of third parties documentation is expressly prohibited.

The duty of confidentiality will continue indefinitely, even when the employment relationship has ended. The employee may not take any information or documentation from Icon Group, including that which is in electronic format, nor contribute or use such information in the interest of other company.

Persons who manage the submission of business proposals in public or private tenders must refrain from any type of conduct that could be understood as a price agreement, either with the bidder or with third parties.

### 5.8. Compliance with tax and Social Security obligations

The fulfillment of the tax obligations and the Social Security payments to which Icon Group is bound shall be carried out in a responsible, loyal and adequate manner to the current legislation.

The people of Icon Group are obliged to respect the principles of clarity, transparency and veracity in their professional activity. Falsification, concealment, simulation of data or accounting entries whose purpose is to circumvent payments or obtain illicit benefits that cause damage to the Public Treasury, Social Security or any creditor are prohibited.

The economic and financial information of the Group shall accurately reflect its economic, financial and equity reality, in accordance with generally accepted accounting principles and applicable international financial reporting standards. For this purpose, no professional should hide or distort the information of the records and accounting reports of Icon Group.

The people of Icon Group responsible for accounting and finance are obliged to fully comply with the regulations that affect accounting, financial, economic, taxes, or any other aspect affecting the Group's tax returns.

#### **5.9. Enforcement of intellectual and industrial property rights and advertising ethics**

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

No images, texts or drawings will be used in advertising or official documents of the Group that have not obtained the corresponding authorization from their rightful owner.

It is also prohibited to use trademarks or logos in advertising or official documents of the Group, which have not previously been registered in the name of Icon Group, or on which the corresponding authorization has not been obtained, or on which it has not been verified that there is no prior industrial property right registered in favor of a third party.

The advertising carried out by the Group must be truthful and may not contain misleading statements that could cause prejudice to potential customers.

#### **5.10. Use of computer systems**

Computer systems and the use of corporate e-mail should be used only for purposes derived from professional activity, and their use must be responsible and careful.

Icon Group reserves the right to monitor the use of computer systems and the use of the Internet by individuals, in order to regulate the use of computer company systems by the worker, with full respect for fundamental rights and in compliance with the current legislation in force.

The warning of the possibility of using the exposed faculty expressly eliminates the reasonable expectation of privacy that could have the people of Icon Group in relation to the use of the corporate computer systems.

The people of Icon Group will not be allowed to use corporate computer systems to carry out actions that could be considered illegal, being expressly forbidden that the people of the Group access to applications or computer equipment of third parties without the previous and documented authorization of the holder.



## 6. Report of infringements

The people of the Group, in accordance with article 31.bis.5.4 of the Spanish Criminal Code are obliged to inform of the possible risks and non-compliances to the Prevention and Control of Criminal Risks office. A Complaints Channel is made available to all Icon Group employees at the following email address: [Compliancedesk@iconocsgroup.com](mailto:Compliancedesk@iconocsgroup.com). Through this, or any other means it deems appropriate, they will be able to deliver their communications to the Authority in a confidential manner. The use of the complaint channel assures the position of the complainant in good faith and prevents any type of retaliation against it.

The communication of infractions of which they are aware is a specific duty of all the people to whom they are subject, and a conduct that tends to prevent or to make difficult the discovery of any improper or illicit behavior of which they would have heard.

This channel is open to suppliers, clients or anyone who has heard of an unethical action and wants to make it clear in accordance with the scope of this Code of Conduct.

## 7. Disciplinary regulations

Violations of this Code, as well as those of the Code of Good Practices of the Pharmaceutical Industry, will entail disciplinary sanctions that, in accordance with labor law and the applicable Collective Labor Agreement, are in accordance with the regulations, without prejudice to bring to the attention of the competent authorities any conduct that could constitute a criminal offense.

### Related documentation

- Icon Group Confidentiality policy
- Icon Group Promotional and non promotional materials and Interaction with HCPs
- Icon Group Compliance violations control procedure
- Icon Group Anti-Bribery and anti-corruption policy
- Icon Group Contract management policy
- Icon Group Tendering and procurement policy