

CODE OF ETHICS



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1. INTRODUCTION



RUBIÓ GROUP (hereinafter, "RUBIÓ GROUP" or the "Group") is a pharmaceutical group integrated by the following companies: Laboratorios Rubió,

S.A., acting as the parent company, and Fisiopharma, S.L.U, Products and Technology, S.L.U and Rubió Metabolomics, S.L.U. acting as its subsidiaries.

LABORATORIOS RUBIÓ, S.A. (hereinafter, 'LABORATORIOS RUBIÓ') is a global healthcare company that was founded in 1968 with the aim of marketing medicines to treat low-prevalence diseases that have a great impact on the abilities and quality of life of those who suffer from them. In 2021, in order to accelerate growth through innovation and expansion into new segments, specifically, the nutraceutical market, LABORATORIOS RUBIÓ acquired FISIOPHARMA S.L.U. (hereinafter "FISIOPHARMA"), a company specializing in nutraceuticals, as well as products that target neuropathies of the central nervous system and muscle and joint tissue disorders.

In 2023, LABORATORIOS RUBIÓ acquired the company ONE WAY LIVER, S.L. (now known as "RUBIÓ METABOLOMICS, S.L.U"), a biotechnology company specialising in the field of metabolomics, further consolidating its expansion in the diagnostic business lines and the commercialisation of R+D services throughcmetabolomics.

Finally, PRODUCTS & TECHNOLOGY S.L.U. (hereinafter, "P&T"), created in 2014, acts as a "patent box" in order to strengthen the R+D+i area of LABORATORIOS RUBIÓ.

Currently, the RUBIÓ GROUP is a pioneer in the introduction in Spain of important medicines. that have contributed to improving people's quality of life, such as a calcium sulphate preparation, a novel drug for the treatment of hyperkalemia or Rubifen and the first drug in Spain for the treatment of ADHD.

This Code of Ethics sets out the rules, commitments and criteria for action applicable to RUBIÓ GROUP and is mandatory for all the members of the Governing Body, Directors and staff in the performance of their functions and responsibilities, regardless of their hierarchical position, seniority, type of labor contract or geographical location in which they perform their functions. It also applies to stakeholders and other collaborators associated with the Group. Our Code of Ethics is the fundamental pillar of our culture.

Within the current framework of the Criminal Liability of Legal Persons, and with the aim of preventing the commission of criminal conduct that can be carried out voluntarily or involuntarily within the Group, a Crime Prevention Model has been developed and implemented, and the present Code of Ethics has been approved, which outlines our values, principles, ang guidelines for conduct.

The recommendations contained in this Code of Ethics do not supersede any provision established by any applicable Convention, Law, Regulation or Provision. In this regard, this Code of Ethics does not replace other internal policies and must be applied in conjunction with other procedures and protocols that the Group has implemented in order to address as many scenarios as possible.

We thank you in advance for the commitment and trust shown, and we encourage our staff and collaborators to embrace this philosophy and way of working, applying the ethical principles and behaviour contained in this document in all the activities carried out on a daily basis.

2. OBJECTIVES OF THE CODE OF ETHICS



This Code of Ethics sets out the principles, standards of conduct, commitments and responsibilities that all RUBIÓ GROUP personnel are expected to have in the performance of their duties, both in internal relations and in the interactions they maintain with all Organisations of interest, managers, suppliers, customers and collaborators.

To this end, this document has the following objectives:



Define the guidelines and procedures that the Group's staff must follow when facing conduct or actions by any team member that may affect the Group's interests.



Provide a framework of support to the Group in the exercise of its right to sanction any action taken by a member of the team that constitutes a breach of their work obligations, a lack of respect for colleagues, a violation of internal regulations or any behavior considered unethical and moral.



Use the Code of Ethics as a preventive tool against possible inappropriate behavior by the Group's staff.

3. SCOPE



This Code of Ethics is mandatory and will apply to the following persons, "Obligated Subjects", whether natural or legal at national and international level:



The Group's governing body (including non-executive members) and other entities that constitute the RUBIÓ GROUP, whatever their composition, form and operating regime.



All staff linked to RUBIÓ GROUP.



Other people linked to the Group, such as volunteers and unpaid trainees.



Business partners: customers, suppliers, internal collaborators, and other interested parties linked to the Group.

4. MISSION, VISION AND VALUES OF THE GROUP



RUBIÓ GROUP, as a pharmaceutical company, has as its **Mission** to offer a reliable service to the end patient through innovation, improvement and high-quality manufacturing processes of its products; thus providing a service to specialists in order to make the treatment of their patients a reality and to improve their health.

For this reason, our **Vision** focuses on consolidating our company at a national level in the Spanish territory and increasing our international presence by offering innovative and quality products.

Our Values should inspire the decisions and actions we take to achieve the milestones set, as they define us and guide our actions. These values provide a **framework** to guide the core actions of all **RUBIÓ GROUP** personnel:



Commitment: a commitment rooted in humility, recognizing limitations and striving to overcome them. We cooperate with the rest of the Group by assuming commitments aimed at achieving common objectives.



Transparency: based on honesty, always acting with honesty and integrity to reciprocate the trust placed in us. Always providing our customers, collaborators, competitors and the community in general with all the necessary help and information.



Teamwork: we cooperate among colleagues and join forces that allow us to achieve the Group's global objectives more efficiently.



Professionalism: we fully develop the tasks and responsibilities to the best of our abilities to meet the commitments and daily challenges with a high degree of involvement with the company's global project.



Innovation and scientific rigor: we have initiative, we are prepared for change and we provoke it, committing ourselves to excellence and scientific innovation. In addition, we remain objective, we analyze the scientific reality and act on the basis of the data we obtain through continuous innovation.



Familiarity: we consider the people who make up our Group as particular individuals, facilitating the reconciliation between their professional and personal lives, creating a close and optimal work environment.

5. ETHICAL AND RESPONSIBLE BEHAVIOR

1.
RULES RELATED
TO ETHICS AND GOOD
GOVERNANCE





FIGHT AGAINST CORRUPTION AND BRIBERY

RUBIÓ GROUP takes a firm position against any act of corruption, including bribery and fraud, regardless of the rank or professional level of those involved. We have zero tolerance policy towards these conducts, which is manifested in our effort to build relationships based on trust and to preserve an unblemished reputation.

To ensure alignment with our ethical principles, we are committed to adhering to standards of ethical behavior and anticorruption legislation. We categorically reject accepting or facilitating bribes and are dedicated to identifying and reporting any form of corruption, whether directly or indirectly, active or passive.

It is the obligation of the members of RUBIÓ GROUP to act with integrity in all their commercial operations. It is prohibited to solicit or accept personal or company benefits that may jeopardize our business ethics or inappropriately influence business relationships.

In this regard, all members of the RUBIÓ GROUP must adapt their behavior to all internal and external regulations related to the prevention of corruption, participate in the relevant training and training, and immediately report any suspicion or knowledge of corrupt activities to the Compliance Committee or the Compliance Officer.



GIFTS, ATTENTIONS AND OTHER COURTESIES

In relation to the gifts and/or invitations that are granted or received from RUBIÓ GROUP, these must always be within the framework of social and commercial relations, strictly limiting themselves to what is considered necessary and acceptable. As a general rule, a gift or invitation of business courtesy may only be offered or accepted if its value does not exceed 150.00 euros, and provided that the other requirements set out in the internal policies that RUBIÓ GROUP has developed in terms of gifts, protocol hospitality and other courtesies are met.

Likewise, the delivery or receipt of gifts must be notified, without exception, to the Compliance Committee or the Compliance Officer. This communication must contain information on the type of gift or attention to be given/received and the identity of the receiver/ sender.

Finally, any form of gift to Spanish or foreign authorities, public officials, political parties or auditors, including their relatives, which could influence the independence of their judgment or induce them to grant favors is expressly prohibited.



COMMITMENT TO PUBLIC HEALTH

At RUBIÓ GROUP we are committed to protecting and defending the rights of our customers and ensuring their safety, providing products of the highest quality. In the Group we consider the safety and quality of our products as one of the pillars of the activity we carry out and part of the values that move us, which is why we are committed to maintaining the highest level of demand in the production and distribution of our products, applying at all times the procedures and protocols established for this purpose.

At RUBIÓ GROUP we reject any practice aimed at manufacturing or dispatching, supplying or marketing nocitive substances or medicines that can wreak havoc on health. Medicines must have the necessary authorization required by law and comply with the technical requirements relating to their composition, stability and efficacy. Likewise,

we ensure strict surveillance of storage and transport used, as well as the use of our facilities and computer resources. We also ensure the implementation of mechanisms for the supervision, surveillance and control of emissions or exposures that may endanger the life, integrity or health of any person.

Furthermore, we undertake to comply with the legislation relating to narcotics, psychotropic drugs or any other means that require control, and we reject any practice related to the trafficking of the same.



PREVENTION OF CONFLICTS OF INTEREST

A conflict of interest is understood to be any situation in which the direct or indirect personal interests of the employees of RUBIÓ GROUP or their relatives may conflict with those of the Group or interfere with their duties and motivate them to act in their performance, generating a personal, economic, political or commercial benefit, contrary to the fulfillment of their labor obligations.

In this sense, the professional decisions adopted at any time by the persons bound by the Code of Ethics, within the scope of their functions and competences, must be based on the best defense of the interests of the Group, so that they are not influenced by personal or family relationships or any other particular interests. All members of RUBIÓ GROUP must adapt their behaviour to comply with all the internal regulations on conflict of interest developed by the Group. They shall also inform the Group at the time of their hiring and during the exercise of their functions, of any situation that could lead to a conflict between their own interest and that of the Group. To this end, the occurrence or possible occurrence of a conflict of interest must be communicated in writing to the immediate hierarchical superior and/or to the Compliance Committee or the Compliance Officer.



GOOD PROMOTIONAL PRACTICES

For RUBIÓ GROUP it is of greater importance to ensure that the information provided within the framework of the promotion of prescription drugs, products and health technology is complete, immediate and truthful.

For this reason, from RUBIÓ GROUP:

- → We ensure that the information on our products is complete, reliable and truthful for the rational use of medicines, as well as the proper evaluation of their quality.
- → We guarantee that all promotional materials and product information are based on scientifically proven results.
- → We ensure that premiums, gifts, prizes, contests, bonuses or the like are not used as methods linked to the promotion or sale to the public of these medicines.
- → We comply with the requirements established for the advertising of medicine or medical device directed to the public.



RESPONSIBLE USE OF CORPORATE RESOURCES AND CYBERSECURITY

At RUBIÓ GROUP we make available to our staff the resources necessary for the performance of their professional activity, and we are committed to providing the means for the protection and safeguarding of resources. The computer resources and equipment provided by the Group are exclusively intended for the fulfillment of labour obligations. Employees must understand that these resources cannot be used for personal or non-professional purposes, and are not for private use.

In the event of termination of the employment relationship with the Group, access to the user's corporate resources will be automatically interrupted. At RUBIÓ GROUP we promote a culture of responsibility and IT security, protecting both corporate resources and the Group's confidential information.



PROTECTION OF PERSONAL DATA

The Group fully respects the privacy of its members and of the third parties with whom we deal and therefore complies with the legal regime for the protection of personal data. We ensure the use and processing of personal data in accordance with the applicable regulations, specifically: Regulation (EU) 2016/679 of 27 April 2016 on General Data Protection Regulation (GDPR) and Organic Law 3/2018 of 5 December 2018 on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD), as well as the internal regulations existing in RUBIÓ GROUP.



CONFIDENTIALITY OF INFORMATION

At RUBIÓ GROUP we consider information and knowledge as key assets for business management, and therefore, they must be specially protected. In this regard, all members of the Group undertake to maintain confidentiality and to make good use of the data, information or any document obtained during the exercise of their responsibilities in the Group, in accordance with internal regulations.

The definition and scope of trade secrets will be established in the internal policies and rules related to the confidentiality of information. However, as a general rule, all data or information not officially published regarding the Group, its customers, its sup-pliers, as well as the information provided by the Group, will be considered confidential information as well as an y non-public information that is owned by RUBIÓ GROUP or has been obtained by the Group in the course of its activity.

In this sense, it is prohibited that the content of confidential information may be disclosed to third parties, except when it is required for business reasons or has the corresponding authorization to disclose it. If there is any doubt about the nature of the information, the staff must consider it as confidential until otherwise indicated.

The duty of confidentiality will remain once the activity has concluded, and the staff of RUBIÓ GROUP will be obliged to return any material they possess related to the Group, at the time of termination of their employment relationship.



INTELLECTUAL AND INDUSTRIAL PROPERTY PROTECTION

At RUBIÓ GROUP, we recognize and value the importance of intellectual and industrial property as fundamental assets for the innovation, competitiveness and sustainable success of the Group. Intellectual and industrial property is understood to be all patents, distinctive signs, copyrights, new creations, trademarks, industrial designs, trade secrets and any other form of property protected by the legal system. For this reason all members of the Group must respect the intellectual and industrial property rights, both their own and those of third parties.

It is strictly forbidden to use, reproduce, distribute or modify any protected material without the corresponding authorization.



ADMINISTRATIVE, ECONOMIC AND FINANCIAL MANAGEMENT

RUBIÓ GROUP fully complies with current regulations concerning due diligence in administrative, economic and financial management in any geographical location where it carries out its business activities.

The Group and its members have an obligation to ensure the accuracy of our financial statements and reports as required by applicable law and accounting principles. In this regard, all financial transactions shall be recorded for in accordance with generally accepted accounting principles, in a correct and non-misleading manner.

At RUBIÓ GROUP we are committed to complying with all accounting, tax and financial regulations, guaranteeing transparency and protecting the interests of any of our economic agents. For this reason, we have several controls in the management processes on financial resources, preventing all those practices that involve the avoidance of the payment of taxes or contributions to the detriment of the Tax Treasury, Social Security, or any other administrative entity of the local or regional Administrations.



COMMITMENT TO THE ENVIRONMENT

At RUBIÓ GROUP, we carry out our activity based on an active and responsible commitment to the conservation of the environment, respecting the requirements set out in the applicable legislation on pollution prevention and environmental protection.

In this regard, RUBIÓ GROUP undertakes to:

- → Comply with current regulations applicable to environmental matters.
- → Identify direct, emergency and potential environmental aspects and implement the necessary controls to reduce, as far as possible, our impact on the environment derived from the activities of the manufacture and storage of pharmaceutical products.
- → Carry out a responsible use of resources.
- → Set ambitious objectives for environmentally friendly production.

- → Promote efficient and sustainable management of natural resources, energy efficiency, the use of renewable energies and the reduction of greenhouse gases emissions.
- → Work with our suppliers to improve their environmental performance.
- → Provide adequate training and internal communication to employees encouraging them to develop good environmental practices.
 - Keep the Group's Environmental Policy up to date and make our employees, both internal and external, participate in it.



RESPECT FOR THE MARKET AND CONSUMERS

At RUBIÓ GROUP we understand that the relationship with the market and our customers is essential for the growth of the Group. Therefore, we are committed to acting with the utmost integrity, transparency and responsibility in all our interactions with our customers, ensuring fair and equitable competition in the market.

Based on the above, all members of RUBIÓ GROUP must comply with the quality and safety standards set by our business areas, ensuring satisfaction and trust in our brand.

We are also committed to providing clear and accurate information regarding the promotion of prescription medicines, products, and health technologies, with the truthfulness of the information being one of the core principles of RUBIÓ GROUP's actions. In this regard, all employees must communicate the information they possess reliably, both internally and externally, and under no circumstances should they knowingly provide incorrect or inaccurate information that could lead to mistakes.



PREVENTION OF HARASSMENT IN THE WORKPLACE, SEXUAL HARASSMENT AND HARASSMENT BASED ON SEXUAL ORIENTATION OR IDENTITY

At RUBIÓ GROUP, we are committed to creating a safe and respectful work environment for all employees. Therefore, the Group adopts a zero-tolerance policy towards any form of harassment, whether work-related, sexual, or related to individuals' sexual orientation or gender identity. We recognize and value diversity in all its forms and strive to foster an inclusive culture that promotes equality and mutual respect.

It is our duty and responsibility to ensure that all staff members feel supported and free from any harassment or discrimination. Consequently, we prohibit any actions, conduct, or behavior that could be considered humiliating or intimidating. In this sense, we fully reject any manifestation of physical, psychological, moral harassment or abuse of authority, as well as any other conduct likely to generate an intimidating or offensive environment with the rights of individuals. Nor do we accept any type of discrimination based on the age, race, gender, sexual orientation or identity, ethnic origin, religion, political opinion, nationality, social origin or disability, as well as any other reason provided for in the applicable regulations.

In the event of observing or witnessing hostile, intimate, humiliating or disrespectful behavior, it must be reported to the immediate superior and/or to the Compliance Committee or the Compliance Officer.



PREVENTION OF MONEY LAUNDERING

At RUBIÓ GROUP we are committed to safeguarding integrity and promoting a culture of absolute rejection of any form of money laundering, respecting international and national standards, as well as complying with any obligation that the regulations of each territory impose on us as part of our preventive measure to fight against money laundering.

RUBIÓ GROUP's staff is responsible for verifying in advance the available information, including financial information, on commercial counterparties and suppliers. In order to determine their credibility and the legitimacy of their activity before establishing commercial relations with them.

Any member of the Group must immediately inform their manager or the Compliance Committee or the Compliance Officer about any suspicious activity in a business, commercial relationship or contract so that the corresponding person in charge can study, analyze and determine whether to suspend the business relationship and/or give notice or report to the competent authorities

5. ETHICAL AND RESPONSIBLE BEHAVIOR

2.
RULES RELATED
TO PROFESSIONAL
ACTIVITY AND INTERNAL
RELATIONS



OCCUPATIONAL HEALTH AND SAFETY OF PEOPLE

RUBIÓ GROUP considers safety in the workplace as a priority issue, therefore, it is committed to ensuring the safety, health and well-being of all its members and to comply with the rules and regulations relating to the prevention of occupational risks.

At RUBIÓ GROUP we will use all the means to develop the corresponding occupational health and safety policies and the necessary preventive measures will be adopted to comply with the provisions of the applicable legislation at all times. For this reason, the RUBIÓ GROUP has prepared and implemented an Occupational Risk Prevention Plan, in accordance with the provisions of the ISO 45001:2018 standard.

In this regard, the Group assumes the following commitments:

- → Integrate Occupational Risk Prevention and the promotion of health and wellbeing into the company's activities and decisions, at all levels of the Group.
- → Comply with local laws and regulations, as well as international agreements and conventions that are mandatory.
- → Identify and evaluate the risks related to our products and operations in order to achieve a high level of health and safety, avoiding risks, assessing those that cannot be avoided, adopting the necessary measures to eliminate or reduce as much as possible the occupational risks generated in the development of our activities.
- → Take appropriate measures to control, minimize or eliminate and communicate risks, as well as carry out inspections and audits on a regular basis.
- → Guarantee compliance with the legal framework on Occupational Risk Prevention. Actions will be carried out to promote the health and well-being of the members of the RUBIÓ GROUP with safety and health campaigns, training, social benefits, labor, ethical and environmental, in addition to ensuring compliance with those other require-

- ments related to the Safety, Health and Welfare of the workers to which the Group adheres.
- → To establish and maintain close collaborative relations with the different Public Administrations competent in the matter.
- → Develop, apply and keep updated the Occupational Health and Safety Management System, with a vocation for the continuous improvement of working conditions, incorporating preventive aspects into all services and projects and developing new and better products, processes and services.
- → To develop the training and information activities necessary for the implementation of a preventive culture, ensuring the competence of all the workers of the RUBIÓ GROUP in the field of Health and Safety at work.
- → Take appropriate contingency measures to control and minimize the consequences of an incident, includingan emergency management organization with regular external and internal training and exercises.

PROMOTION OF EQUAL OPPORTUNITIES

At RUBIÓ GROUP we carry out responsible management of our capital and human talent that guarantees equal opportunities for the development and promotion of professionals, access to and maintenance of employment, as well as the socio-occupational inclusion of excluded groups. We support diversity as an enriching factor within teams and ensure an equitable and inclusive environment.

Employees must promote a safe work environment that respects the dignity, individual freedom, and fundamental rights of all individuals within RUBIÓ GROUP.

RESPECT FOR HUMAN RIGHTS

At RUBIÓ GROUP we are committed to respecting internationally recognized Human Rights, which include the rights established in the Universal Declaration of Human Rights of the United Nations and the fundamental conventions of the International Labour Organization.



PHYSICAL INTEGRITY AND SEXUAL INDEMNITY OF THE MEMBERS

RUBIÓ GROUP will not tolerate any conduct that may interfere with the physical integrity and/or sexual indemnity of its members, clientele, or any other individuals associated with the Group's Interest Organizations. Acts that violate physical and sexual integrity, and/or that are intended to cause physical harm or emotional trauma to a person, are expressly prohibited.

RUBIÓ GROUP and all its staff will ensure that any type of harassment or abuse of superiority is avoided. In this regard, the Group will appropriately investigate any communication reported to the Compliance Committee and, where appropriate, will communicate it to the competent authorities.

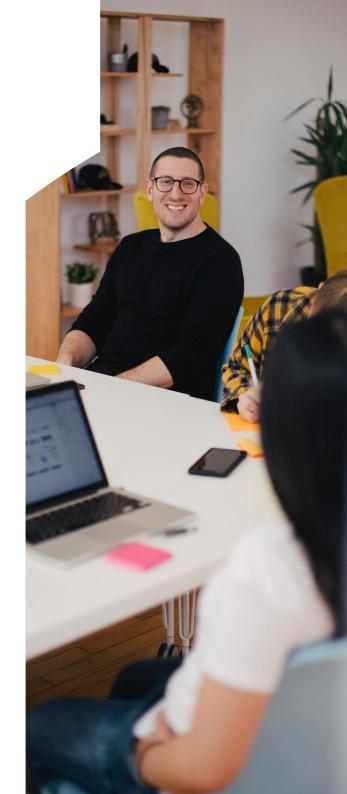
RESPECT FOR THE IMAGE AND REPUTATION OF THE RUBIÓ GROUP

RUBIÓ GROUP conceives its image and reputation as one of its most valuable assets to preserve and enhance the trust of our customers, suppliers, staff, business partners and society in general.

To this end, we maintain the integrity of our reputation through an appropriate, clear and accurate communication with our stakeholders. Likewise, we also ensure the respect and proper use of the Group's image and reputation by all individuals associated with RUBIÓ GROUP.

Our reputation for integrity is significantly shaped by the information we share with the public. For this reason, it is crucial that all communications accurately reflect the true nature of our business relationships. Today, the use of social media platforms – such as Instagram, Facebook, X, and others – by Group members, whether in a professional or personal context, plays a crucial role in creating and sharing content, opinions, perceptions, experiences, and perspectives. Given the significant influence of these platforms, only authorized individuals are permitted to engage with them or any other public communication channels while representing RUBIÓ GROUP.

If a request for information is received from the media, an external legal representative, or a public organization, it must be directed to the Compliance Committee or the Compliance Officer.



6. DISCIPLINARY REGIME



The responsibility for ensuring compliance with the above principles, conduct, and guidelines lies with each and every individual within the Group and those associated with it.

Therefore, no person bound by the Code of Ethics, regardless of their position or role, may engage in actions or conduct that contradict it or current applicable law.

Likewise, no member of the Group, regardless of their level or position, is authorized to request any employee to contravene the provisions of this Code of Ethics, and no one may justify their conduct by relying on an order from a superior or claiming ignorance of it.

With respect to suppliers, adherence to the Code of Ethics will be included in any supply or service provision contract. Non-compliance may give RUBIÓ GROUP the right to renounce or terminate the contract without any obligation for compensation or indemnification.



Failure to comply with the Code of Ethics may entail labour consequences for breach of contractual good faith, regardless of the administrative or criminal consequences that, where appropriate, may also be applicable. Such non-compliance may also lead to disciplinary action under labour legislation and the application of applicable collective agreements.



7. DISSEMINATION AND MONITORING



RUBIÓ GROUP will take appropriate measures to ensure that all recipients are fully aware of the contents of this Code of Ethics and understand its scope. Acceptance of this Code of Ethics will be a requirement for anyone joining the Group. The Code of Ethics will be accessible on both the intranet and the corporate website, allowing all individuals who are or may be linked to the Group to easily access it.

This Code of Ethics will be mandatory for all levels of the company, and failure to comply with it will constitute a very serious infringement, which will be subject to the corresponding sanction.

The scope of application of this Code of Ethics may be extended to suppliers, customers, distributors, external professionals, and representatives of RUBIÓ GROUP, who will be required to accept this Code or their own equivalent Code of Ethics.

All contracts signed by RUBIÓ GROUP must include a clause that requires the other party to comply with the law and the ethical principles established in this Code of Ethics or its own equivalent Code of Ethics. Failure to comply with these obligations will constitute a serious breach of contract.



8. REVIEW AND UPDATE



The Compliance Committee or the Compliance Officer shall periodically review this Code of Ethics, taking into consideration the annual reports and suggestions of the persons who make up the Group. The Group's General Management will be responsible for approving the proposed changes to this Code of Ethics.

RUBIÓ GROUP is committed to providing the necessary training courses to ensure that all members of the Group are aware and fully informed of the rules set out in this Code of Ethics and any updates that may be made to it.



9. **ETHICAL CHANNEL**



All members of the Group undertake to take the necessary measures to detect and correct any action contrary to the law or the rules of this Code of Ethics. To ensure its effectiveness, the Group will establish an Ethical Channel for reporting non-compliance and potential criminal acts. In case of doubts about the Ethical Channel, you can go to the Ethical Channel Document or transmit your doubts to the Compliance Committee or the Compliance Officer.

The entities responsible for ensuring the correct compliance with this Code of Ethics are:

- → Compliance Committee or the Compliance Officer.
- → Senior Management.

RUBIÓ GROUP undertakes not to adopt or allow any form of reprisal, direct or indirect, against professionals who in good faith have reported through the Ethical Channel an action contrary to the law or the rules of the Code of Ethics.

All internal institutions, staff and related third parties are expected to comply with the Code of Ethics, and if they have any doubts about how to act, they should raise them with the Compliance Committee or the Compliance Officer or any member of the management team, through the following email:



compliance@labrubio.com





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