

SUPPLIER'S CODE OF CONDUCT

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Considerations

GRUPO FARMA takes pride in upholding the highest standards of ethics, integrity, and responsibility in all its operations and relationships with third parties. The Company's activities and business are conducted based on the core values that guide it, promoting **Closeness** and mutual respect among its employees and stakeholders.

It fosters **Transparency** as a key principle, ensuring compliance with current laws and regulations, the integrity of its people, and ethical and responsible behavior toward society and the environment which are essential pillars of its way of operating.

In its ongoing pursuit of excellence across all processes, **GRUPO FARMA** continuously strives and works to promote the **Commitment** of each employee, achieved through leadership that drives innovation and teamwork. By doing so, it ensures that suppliers and strategic partners share these same values, with the highest standards of quality and responsibility.

GRUPO FARMA values its third parties as strategic partners in order to achieve its objectives and therefore considers it essential to establish strong collaborative relationships based on shared principles and values. This Code of Conduct aims to define the expectations and guidelines that should govern the relationship with its suppliers, who play a vital role in caring for and safeguarding the health of patients and society as a whole.

Therefore, all third parties are invited to identify with these **Values**, act with transparency, and comply with the laws and regulations of the countries in which they operate. Likewise, it is expected that third parties have practices that promote sustainability, community well-being, and an ethical and responsible environment throughout the entire value chain. **GRUPO FARMA** values commitment to social responsibility as an opportunity to generate a positive impact, and therefore expects its suppliers to uphold ethical principles and responsible business practices, applying these same standards in their relationships with other stakeholders/third parties involved in the provision of goods and/or services.

1 Business Ethics and Conduct

1. Business Ethics and Conduct

Suppliers and third parties must operate in a legal, ethical, and honest manner, ensuring not only compliance with all applicable laws and regulations, but also the integration of ethical principles into daily decision-making. Their actions must be conducted with integrity, transparency, and responsibility.

.....• Business Integrity and Transparency

GRUPO FARMA maintains a strict **zero-tolerance** policy against bribery, corruption, and any form of improper business conduct. Accordingly, its suppliers and third parties must refrain from offering, paying, accepting, soliciting, receiving, or engaging in any illegal or unethical activity in the context of negotiations or in their interactions with government officials, healthcare professionals, healthcare organizations, spokespersons, key opinion leaders, speakers, consultants, or third parties in general.

When acting on behalf of **GRUPO FARMA** or in the context of their business activities with the company, suppliers and third parties must conduct themselves according to the highest standards of integrity, complying with all applicable national and international laws related to the prevention of bribery, corruption, money laundering, and the financing of terrorism.



Any type of incentive, financial benefit, sponsorship, or contribution must comply with applicable regulations, be properly documented, and serve a legitimate, transparent, and verifiable purpose. It is strictly prohibited to offer any benefit with the intent of unduly influencing regulatory, contracting, or purchasing decisions.

Likewise, suppliers must avoid any situation that creates or may be perceived as a **Conflict of Interest** that could affect the independence of their decisions or compromise the reputation of **GRUPO FARMA**. They are expected to implement adequate internal controls to identify and manage potential conflicts of interest.

It is essential to act with transparency and integrity in all business relationships. Therefore, suppliers must immediately disclose any circumstance that represents a conflict of interest, including personal, professional, or financial interests of GRUPO

FARMA employees in the supplier's business or decisions. This applies both to current situations and to those that may arise during the course of the business relationship.

Suppliers must have appropriate tools and systems in place to ensure compliance with applicable regulations and to properly govern their interactions with third parties. This includes adopting industry standards for the transparent, honest, and consistent management of business transactions, operational processes, and financial activities.

Any offering of gifts, hospitality, or business courtesies must be justified by acceptable business practices, be of symbolic value, occur occasionally and, not be subject to interpretation as a form of undue influence.



.....• Confidentiality of Information

GRUPO FARMA ensures the proper handling and use of information across all its operations, in compliance with best practices and applicable laws in the countries where it operates. Therefore, its suppliers must treat information as a valuable asset and manage it with the utmost confidentiality.

We value the discretion of our suppliers in the use and protection of all information generated during commercial or regulatory activities, based on the following standards:



Have technical measures in place to preserve the confidentiality, integrity, and availability of information, ensuring that their employees are aware of and adhere to confidentiality policies, and make responsible use of technological resources and information.



Raise awareness among their employees about their responsibility and obligation to ensure the confidentiality of the information they handle or have access to. This process must be carried out transparently and lawfully, obtaining the required authorizations and applying strict measures of security, confidentiality, and limitation of access to systems, applications, information, and data (principle of least privilege).



Ensure that any information shared in the context of relationships with healthcare professionals, consultants, or regulatory authorities is properly protected and not disclosed without the prior written authorization of GRUPO FARMA.

.....• Information Privacy

Suppliers must protect the personal and business data of **GRUPO FARMA**, ensuring a level of security, confidentiality, and handling that is equal to or greater than that which GRUPO FARMA offers its counterparts.

Suppliers commit to strictly complying with all applicable laws on Privacy and Personal Data Protection, both in their countries of origin and in accordance with relevant international treaties and regulations. Additionally, suppliers must have technical, organizational, and contractual measures in place to ensure the responsible collection, use, storage, transmission, and disposal of personal data. This includes ensuring traceability, limiting data processing to what is strictly necessary for authorized purposes, and obtaining informed consent where required.

.....• Cybersecurity

GRUPO FARMA suppliers must have appropriate cybersecurity policies, tools, and controls in place to protect their systems, networks, and data from unauthorized access, cyberattacks, or any other incident that could compromise information. They must also implement Business Continuity Plans, incident response procedures, and disaster recovery strategies aligned with internationally recognized standards.

Any incident, intrusion attempt, or vulnerability that may directly or indirectly affect GRUPO FARMA must be reported immediately to the Company's designated area.

Suppliers must ensure that their cybersecurity practices are aligned with GRUPO FARMA's internal policies when applicable and that their personnel are properly trained in the secure use of information.



.....• Global Trade Laws

Suppliers must maintain ethical, transparent, responsible, and sustainable business relationships aligned with the principles of legality and fair trade, complying with all applicable national and international regulations, including those related to export controls, sanctions, free competition, and fair trade practices.

They must also observe the Arm's Length Principle promoted by the OECD, ensuring that commercial terms—especially in cross-border transactions—reflect market values and are established independently. During negotiations, all information and interactions must be timely, accurate, and consistent with GRUPO FARMA's values, ensuring complete documentation and traceability at every stage of the process.



.....• Intellectual Property

Suppliers are required to respect and protect the intellectual property rights of GRUPO FARMA and third parties, including patents, trademarks, industrial trade secrets, copyrights, and any other intangible asset. Accordingly, they must ensure that no element of such intellectual property is used, reproduced, or disclosed without the prior, express, written authorization from the appropriate level within **GRUPO FARMA**.



2 Management systems

2. Management Systems

.....• Risk Management

Suppliers must have effective and comprehensive risk management systems that allow them to identify, classify, analyze, mitigate, and monitor risks that may affect their operations or their relationship with GRUPO FARMA. Likewise, they must have timely response mechanisms in place for risk situations, including business continuity and crisis management plans.

.....• Trade Sanctions and Export Controls

Suppliers must identify and comply with all applicable laws related to trade sanctions and export controls, and confirm that neither they nor their affiliated companies, shareholders, or directors are listed on any global restricted party lists, such as the Specially Designated Nationals and Blocked Persons List (SDN List), the United Nations Sanctions List, the European Union Sanctions List, or other similar listings.

They must also ensure that they are not directly or indirectly owned by individuals or entities included in such lists, and must promptly notify GRUPO FARMA if they become subject to any such restrictions during the course of the business relationship.



.....• Books and Records

Suppliers must ensure the accuracy and reliability of the accounting, operational, and commercial information they manage in connection with activities related to **GRUPO FARMA**. Operational results, transactions, and financial arrangements must be recorded transparently and in strict compliance with applicable legal requirements, as well as generally accepted accounting principles, as appropriate.

Books and records must be maintained in sufficient detail to allow for transaction traceability and be available for audits or reviews when required. Additionally, suppliers must adopt responsible business conduct, fully and promptly meeting their tax obligations, avoiding practices of tax evasion or tax avoidance, and contributing ethically to the economic and social development of the communities in which they operate.

.....• Audit Rights

GRUPO FARMA reserves the right to audit suppliers in accordance with previously established contractual agreements, either directly or through a designated third party, upon reasonable prior notice, in order to verify compliance with the provisions of this Code when required. If an audit is conducted, GRUPO FARMA will ensure respect for the supplier's internal procedures, confidentiality regulations, and applicable legal restrictions.

3 Human and Labor Rights



3. Human and Labor Rights

GRUPO FARMA promotes the protection and compliance fulfillment of human and labor rights, freedom of association, and equal opportunity. Therefore, it requires its suppliers and business partners to comply with these principles, actively respecting and supporting such rights. The following guidelines are essential to ensuring a fair, safe, and inclusive work environment:

.....• Fair Hiring and Non-Discrimination

It is required to attract, retain, motivate, and compensate human talent based on competencies and performance, without any discrimination on the basis of race, color, religion, gender, sexual orientation, marital status, nationality, disability, or other identity characteristics. In addition, compliance with all applicable laws to prevent workplace harassment, sexual harassment, discrimination, and any form of intolerance or violence is mandatory. All complaints must be investigated confidentially, with necessary corrective actions taken and protection provided to whistleblowers against retaliation.



.....• Child Labor and Forced Labor

Compliance with laws prohibiting child labor and forced labor is mandatory. For the purposes of this Code, such practices are considered forms of modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The hiring of young workers must be carried out in accordance with the labor laws of the country of employment, with clear and verifiable mechanisms in place to confirm the candidate's age as an integral part of the recruitment and hiring process.

Under no circumstances shall minors be employed in conditions that compromise or endanger their health, development, dignity, or education.

Likewise, the absence of forced labor must be ensured, including involuntary work, debt bondage, human trafficking for labor purposes, or any form of coercion to force an individual to work against their will. Suppliers and other business partners must have effective policies, procedures, and reporting mechanisms in place to prevent, detect, and remedy any instance of child or forced labor within their operations and supply chain.



.....• **Wages, Overtime, and Employment Benefits**

Suppliers and third parties must respect and promote fair labor conditions, ensuring compliance with applicable labor laws in the relevant jurisdiction, including those related to minimum wages, overtime pay, and mandatory legal benefits, among others.

Additionally, suppliers must ensure that employees receive clear, timely, and understandable information regarding payment conditions, including base compensation, wage calculation criteria, and policies applicable to overtime in accordance with the relevant regulations.

.....• **Substance-Free Work Environment**

Suppliers must ensure a workplace free from substance abuse by implementing clear prevention policies and promoting healthy lifestyle habits among their employees.

.....• **Freedom of Association and Collective Negotiation**

GRUPO FARMA cooperates with suppliers and third parties that respect their employees' right to freedom of association and collective negotiation, in accordance with applicable local and international laws and regulations, as well as the fundamental conventions of the International Labour Organization (ILO).



4 Product Quality and Safety

4. Product Quality and Safety



GRUPO FARMA is committed to maintaining the highest quality standards in its products and services and expects the same level of commitment and rigor from its suppliers. Suppliers must guarantee the safety, quality, and performance of their products and/or services at every stage of the value chain: manufacturing, marketing, distribution, sales, and after-sales services. This includes ensuring that production is carried out using materials, services, and processes that comply with current regulatory requirements, Good Manufacturing Practices (GMP), and established quality management systems.

Suppliers must have strict controls at every stage of the production process in order to identify and correct any deviation that could compromise the quality or safety of the final product.

Regarding commercialization and distribution, it is the responsibility of suppliers to ensure that products reach consumers in optimal condition, complying with proper storage and transportation standards. Likewise, they must provide clear, accurate, and verifiable information on the use and maintenance of the products, and offer an efficient after-sales service that meets and responds to the required needs and expectations.

It is essential that suppliers comply with all applicable laws and regulations, particularly those related to product quality and safety, ensuring conformity with current standards on quality management, traceability, and the prevention of production deviations. In addition, they must conduct regular evaluations of their processes and products to ensure their effectiveness and promote continuous improvement.

Finally, suppliers must stay up to date with market regulations and trends, adapting their processes and products to ensure customer satisfaction and long-term sustainability.



5 Corporate Social Responsibility

Suppliers should be committed to the conservation of natural resources such as water, soil, air, and biodiversity through an approach that includes, among other aspects:

1

Waste Management

Classification, recycling, and responsible and proper disposal.

2

Emission Reduction

Adoption of measures to reduce greenhouse gas emissions and other atmospheric pollutants.

3

Sustainable Use of Resources

Efficient and responsible use of natural resources in all operational processes.

Similarly, suppliers and counterparts must promote among their employees a culture of respect and active commitment to the conservation and preservation of the environment within their scope of responsibility and competence.





6 Implementation and Compliance

6. Implementation and Compliance

GRUPO FARMA has developed this Code with the objective that it be known, accepted, and applied by all its suppliers and counterparts. Therefore, we request a careful and thorough reading of the document to foster both individual and collective awareness, and to ensure compliance with the established guidelines.

The purpose of this Code is to define the principles and standards that govern the conduct of suppliers in all their actions.

It is essential that suppliers share and understand the importance of acting with integrity, transparency, and responsibility in all their operations.

By adhering to this Code of Conduct, suppliers not only meet the expectations and values of **GRUPO FARMA** but also contribute to creating a more ethical and sustainable business environment.

A background image showing a woman in a white shirt pointing at a document on a table during a meeting. Other people are visible in the background, including a man with glasses.

7 Identification and Reporting of Situations

GRUPO FARMA is committed to supporting all its suppliers and encourages them to report any irregular situation or inappropriate conduct that may represent a violation of the principles established in this Code. To facilitate this, it provides a whistleblowing channel **Speak Up – Tu Voz Cuenta**, which can be accessed through the following means:



Website:
<https://grupofarma.com/en/complaints-channel/>



Telephone Hotlines:
In every country where **GRUPO FARMA** has a presence.



Email:
grupofarma@integritycounts.ca

GLOSSARY

Arm's Length Principle

Fiscal and economic standard requiring that transactions between related parties be conducted as if between independent of parties under market conditions, to avoid price manipulation or undue tax benefits.

Collaborator

Term used to refer to an employee of a company.

Conflict of Interest:

A situation in which a person or entity maintains personal, social, or professional relationships, or engages in other businesses, investments, or external activities that influence or may be perceived as influencing their decision-making, performance, or fulfillment of responsibilities.

Corporate Social Responsibility

Voluntary commitment of companies to sustainable development through ethical and responsible management on their economic, social, and environmental impacts of stakeholders.

Cybersecurity

Set of measures, practices, and technologies aimed at protecting computer systems, networks, and data from unauthorized access, cyberattacks, loss, or alteration.

International Labour Organization (ILO)

Entity that establishes international labor standards.

Organization for Economic Cooperation and Development (OECD)

International organization that promotes policies to improve economic and social well-being worldwide.

Personal Data

Any information that allows to directly or indirectly identify a natural person.

Principle of Least Privilege

Establishes that a user, system, process, or application should have only the strictly necessary privileges (permissions) to perform its functions.

Supplier

Natural or legal person who supplies goods, services, or inputs to GRUPO FARMA.

Whistleblower Channel

Tool established by Grupo Farma to enable employees, collaborators, or any person or organization to safely, confidentially, or anonymously report potential irregularities, unethical conduct, or illicit activities without fear of retaliation.

Sustainability

Meeting the needs of the present without compromising the ability of future generations to meet their own needs.



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