



ETHICAL CODE

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DIATER



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LETTER FROM THE MANAGEMENT

Dear collaborators,

We are aware of the importance of complying with the rules by which modern societies are governed. The prestige and reputation of Diater have sought from the beginning to obtain the required vote of confidence from the colleagues and fellow citizens with whom we interact, and it is precisely this circumstance that implicates our conduct and attitudes in an ongoing and exemplary manner.

Values such as education, integrity and respect represent the foundations on which we base our obligation to generate social well-being and professional development. That is why we have studied and designed this Code of Ethics, which incorporates each and every one of the forms of action between internal and external collaborators, such as clients, suppliers and administration. We understand and ratify that each of the sections included in the Code of Ethics must signify the highest priority in its application for each and every one of us.

This Code of Conduct therefore represents our basic form to be applied with all the people and institutions we interact with and is associated with a manifest legal significance. For those cases of circumstances not included or of doubtful application, Diater has created a Compliance Committee, which will guide and resolve any questions that may be linked to the application of the Code of Ethics.

The Management supports the text in its entirety and acknowledges in advance the support required from all of us to achieve, and not only uphold, but strengthen, Diater's exemplary profile.



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INTRODUCTION



The purpose of the Code of Ethics is to establish the behavioural guidelines for all the people who work at Diater as they carry out their daily work.

- It constitutes the highest level instrument in the regulatory framework and its principles are developed as part of the policies, standards and procedures.
- Diater undertakes a commitment to carry out all its activities in accordance with current legislation, so that the people who work at Diater will carry out their professional activities in compliance with said law.
- At all levels, the real and effective application of these principles will be ensured, as well as the reaching of a high level of commitment in compliance with this Code of Ethics.



This Code of Ethics must be accepted by any person who forms part of Diater's organisational structure as a prerequisite to their inclusion, and will also be extended to its suppliers, collaborators and clients.

It contains a protocol for action in the event of non-compliance, which will be applicable in the event of a violation of the ethical principles contained therein.



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SCOPE OF APPLICATION

This Code of Ethics is applicable to:



All Diater companies, as well as affiliated companies over which they have effective control.



The entire organisation, including the administration and control bodies, senior management and all staff.



Collaborators, suppliers and clients of the entity.



The activities that Diater carries out in any geographical area.



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COMPLIANCE WITH REGULATIONS



All Diater collaborators must respect the Laws in force at all times, this Code of Ethics and the rest of the company's internal regulations.

At no time and under no circumstances may the pursuit of Diater's interests justify conduct that is not in accordance with the law or this Code of Ethics.



Collaboration will be carried out at all times with the activity of the public authorities in acts or proceedings that fall within their competence.

Any type of action or circumstance that could obstruct said activity will be avoided, especially in the case of inspection actions.



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CORRUPTION



PUBLIC CORRUPTION

Diater bases its relationships with the public sector on the principles of transparency and equal opportunities and rules out any action aimed at obtaining an advantage over the competition, in the market or in public contracts based on an illegal act.

Consequently, authorities, positions or public officials may not be favoured or offered money, gifts or any other financial or patrimonial benefit aimed at obtaining any type of advantage in favour of Diater.

Likewise, no offer from public positions or officials to carry out acts in favour of Diater in an unjustified manner or in exchange for gifts, presents or other benefits may be accepted.



PRIVATE CORRUPTION

Diater bases its action in the market and its relations with its customers, suppliers and competitors on the principles of free competition and equal opportunities, ruling out any action aimed at achieving an advantage in the market or in the contracts with its customers and suppliers that are based on an illegal act.

Consequently, people who hold decision-making positions in other companies may not be offered or favoured with money, gifts or any other financial or patrimonial benefit aimed at obtaining any type of advantage in favour of Diater.

Nor may the request be met or the offer of any person accepted to carry out acts in favour of the company in exchange for a financial or patrimonial advantage.

Suppliers of goods and services will be contracted under the objective criteria of reliability, availability and value for money.



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INFLUENCE PEDDLING

Influence peddling shall be considered to be any action or strategy that aims to guide or influence the actions of a position, public official or authority, taking advantage of their personal relationship with them or with another public official or authority to achieve a resolution that may directly or indirectly generate a financial benefit or avoid a loss of any kind to the company itself or to a third party.

No activity may be carried out that may constitute influence peddling, detailed above.



RELATIONSHIP WITH POLITICAL PARTIES

The company may have a relationship with political parties within the framework of what is established in the legal system of the countries in which it operates and in compliance at all times with national laws regarding the financing of political parties.



CONFLICT OF INTERESTS

A conflict of interests will be considered to be that situation in which a business action or decision may be influenced by a particular interest of the Diater person or people who participate in it, or of third parties with whom they have a personal relationship.

All Diater people will attend only to Diater's interests and, consequently, will refrain from carrying out any activity that could lead to the appearance of conflicts of interest, duly warning their superiors of said circumstance.

These prohibitions will also apply in the event that the beneficiary of the prohibited acts or activities is a person linked to the Diater person who performs them.



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DONATIONS, FINANCING, SPONSORSHIP AND PATRONAGE

Diater contributes to the development of the communities with which it is related, through donations, financing, sponsorship and patronage of projects with a social, cultural or scientific content.

In accordance with this commitment, any donation, financing, sponsorship or patronage conducted must:

- Have the necessary internal and, where appropriate, external authorisations.
- Be made to entities that have an appropriate organisational structure to guarantee the proper administration of resources.
- Be faithfully reflected in the accounting records.
- Not be used as a means to cover up an improper payment or bribe.

Additionally, the donations made in favour of the aforementioned institutions will be made in a transparent manner and followed up to ensure that they are used for the established purposes.

Donations are not permitted to be granted to health professionals on an individual basis, except for collaboration or sponsorship to attend events and meetings as provided for by the codes of conduct of the country where said professional practises.



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GIFTS AND BUSINESS INCENTIVES

As a general rule, gifts may not be given or accepted during the exercise of our professional activities. Exceptionally, they are allowed provided that they are not prohibited by current legislation and that they correspond to signs of courtesy or usual commercial attention.

In any case, gifts will never be conditioned to obtain a specific result nor will they ever be the consequence of an act or decision adopted by the recipient.

In the event that the recipient is a healthcare professional, we must also abide by the applicable codes of conduct in the country where said professional practises.



FACILITATION OR PROCESS PAYMENTS

In the case of actions of introduction, commercialisation or establishment in foreign countries, payments or gifts may not be made to public officials of said countries in order to facilitate an administrative procedure, obtain an import license or a permit, a favour or a service of any other kind.



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TRAVEL AND REPRESENTATION EXPENSES

Staff travel and representation expenses may not be used to cover up bonuses to clients, suppliers, collaborators or healthcare professionals.



RELATIONSHIP WITH THIRD PARTIES*

The contracting processes of third parties will be carried out with impartiality and objectivity, and quality and cost criteria must be applied in said processes.

Diater will promote awareness of and compliance with this Code of Ethics and, where appropriate, the regulations that govern it, and the adoption of guidelines for conduct consistent with it.

Diater will establish control over said third parties that will be proportional to the level of risk they represent in relation to the crime of corruption.

**Suppliers, distributors, collaborating companies and affiliated companies over which Diater does not have effective control.*



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COLLECTIVE SAFETY AND PUBLIC HEALTH

Diater has controls over any activity or product that may create, directly or indirectly, a risk to collective safety and public health, due to the toxicity of the components or any other threat to people.

It also has established a pharmacovigilance system to guarantee the correct, effective and safe use of its products, with the aim of improving the health and well-being of patients as well as facilitating the activity of health

professionals, thus contributing to the optimisation of public health and safety.

Diater will ensure the protection of its patients and consumers, and against counterfeiting and manipulation of its products, given that it can be dangerous for its consumers, its reputation and public health in general.



All staff will ensure compliance with all these aspects in the exercise of their professional activities.



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FARMAINDUSTRIA



In the interest of reinforcing trust between the pharmaceutical and healthcare sectors, the pharmaceutical industry as represented by Farmaindustria is taking a step forward towards better transparency in the relations between the pharmaceutical industry and healthcare organisations.



Diater is covered by the Farmaindustria Code and undertakes to fully understand and comply with it.

This commitment also extends to all its employees and collaborators, who must assume as their own the guidelines issued by said organisation that affect Diater's scope of activity.



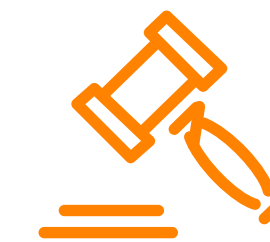
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RESPECT FOR PEOPLE



Diater respects the internationally recognised human rights in the International Bill of Human Rights and the principles related to the rights established in the Declaration of the International Labour Organization.

Diater's staff is the basis of the effective management of the organisation, and positive staff attitude and aptitude is protected and promoted, including a complete and permanent training programme, both in management matters as well as the foundations and ethical values developed in this Code of Ethics.



RIGHT TO EQUALITY

Labour relations at Diater are based on the principles of mutual respect and equal treatment and opportunities.

Consequently, no type of discrimination against any person due to their ideology, religion or beliefs, origin, gender, sexual orientation, family situation, illness or disability will be accepted.



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RIGHT TO PRIVACY

Diater will respect and protect the privacy of the people who provide it with their personal data or confidential information.

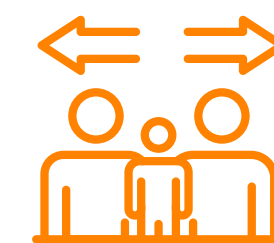
Diater will control the channels through which personal data is obtained and will ensure that applicable regulations are complied with. These data will be kept according to the security measures that correspond to their nature.

The reviews and inspections arising from the reported breaches of this Code of Ethics will be carried out following a protocol that guarantees respect for the privacy and dignity of the people affected.



LABOUR RIGHTS

In no case will labour or Social Security conditions be imposed that harm, suppress or restrict the recognised rights for staff by legal provisions, collective agreements or individual contracts.



RECONCILIATION OF FAMILY LIFE WITH WORK ACTIVITY

Diater will attempt to facilitate the reconciliation of work in the company with the personal and family life of all the people who are part of it.



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SAFETY AND DIGNITY AT WORK

Diater establishes working conditions that respect individual dignity, in safe and healthy work environments. No intimidating or harassing behaviour towards the worker will be tolerated. If any type of behaviour with these characteristics is detected, the appropriate measures will be taken, including informing the competent authorities and the internal control bodies so that they may adopt the appropriate measures.

The health, safety and well-being of people are fundamental to Diater. That is why, within the organisation, the creation of the most appropriate working conditions will be promoted to assist with Diater being considered a Healthy Organisation, as established by the World Health Organisation.

All the work to be carried out by Diater staff in its own or third-party facilities must comply with the safety conditions required by the occupational risk prevention regulations. Additionally, Diater will ensure compliance with said regulations by those who visit its facilities.

Diater is obliged to establish the security measures required by law and all people are obliged to respect them, so that no security or ergonomic measure implemented in the workplace may be withdrawn or neutralised.



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CONFIDENTIALITY



Diater undertakes to protect and apply the necessary measures to maintain the integrity and confidentiality of the information processed by the entity.

This obligation also includes any collaborator of the entity, and any type of processing.



All information processed by any Diater collaborator will be considered confidential, and may not be disclosed except for legal reasons or by express agreement.

In compliance with current regulations, the duty of secrecy will continue even after the contractual relationship has ended.



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MARKET AND CONSUMERS

Diater bases its action in the market on the principles of free competition and equal opportunities, and rules out any action aimed at obtaining an unfair or illegitimate benefit, exploitation or advantage over customers, suppliers, competitors and other market players.

Consequently, the following actions or behaviours will be prohibited:

- Unauthorised access to confidential information from other companies.
- Industrial espionage.
- Disclosure of business secrets.
- Use of proprietary or external privileged information for any type of transaction or business.
- False advertising.
- Scams, fraud and deception of any kind.
- Spreading false rumours about products, services, market conditions, etc.
- Manoeuvres to alter the price of third-party products.
- Manoeuvres to alter the price or value of a company.
- Manipulation of public contests.
- Falsification of means of payment.
- Manoeuvres to bring the company into insolvency to defraud creditors.



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FINANCES, TAXATION AND SOCIAL SECURITY



Diater will comply with its obligations in tax and Social Security matters.



Diater's accounts must faithfully reflect its economic-financial situation.



Diater will establish the appropriate procedures and controls to prevent any client or supplier from attempting to use Diater's structure for a money laundering operation.



As a general rule, no cash payments will be made by Diater. In the event that the use of cash is necessary, a detailed record of the payments made with it will be kept.



Diater will be transparent in relation to the subsidies it receives. False or misleading information may not be used for the purpose of obtaining subsidies, deductions or other types of aid or advantages.



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ENVIRONMENT



Diater is firmly committed to the protection, conservation and improvement of the environment and natural capital.

For this reason, it carries out its activities through the sustainable management of natural resources and the minimisation of the environmental footprint in the different stages of the life cycle, promoting eco-innovation and leading a process of change towards a circular economy model.



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VERACITY OF THE INFORMATION PROVIDED



In the contracts made with Diater suppliers, **the provision of complete, transparent information** about the supplier's capabilities and resources is required in such a way that at all times Diater can access the criteria and information necessary to make decisions based on a faithful image of the supplier.



In the same sense, all the declarations before the administrative authorities will represent a faithful image of the situation of the company.



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INTELLECTUAL AND INDUSTRIAL PROPERTY



Diater, in its commitment to promoting creativity and innovation for the development of products that contribute to the well-being of society, will ensure the protection of both its own intangible assets and those of third parties.

Consequently, without due prior authorisation, the total or partial copying or reproduction of intangible assets of third parties will not be permitted, nor will the transformation or modification, in whole or in part, the importation or distribution of said assets.

They will fall into the category of assets protected by intellectual property, industrial secrets, trademarks, patents, industrial designs, domain names, books, videos, musical works, fonts, advertising campaigns, slogans, brochures, catalogues, written texts,

speeches, presentations, reports, studies, drawings, graphics, paintings, comics, projects, plans, maps, models, architectural or engineering designs, computer programs and any other protected work, even if the copyright symbol or reservation of rights does not appear.

All programs installed on Diater computers and mobile devices must have the corresponding licence for use.



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COMPUTER SECURITY



Diater will ensure the prevention and control of crimes or inappropriate uses that may occur through information technologies.

Diater has a standard that regulates in detail the use of corporate information and communication technology resources by users, both internal and external.

Among these forms of conduct, which constitute prohibited acts at Diater, the following stand out:

- Unauthorised access to the computer systems of competitors, customers or any other company or public or private organisation.
- Dissemination of viruses or

programs that may cause damage to material or immaterial assets.

- Denial of service attacks.
- Manipulation of electronic auctions.
- Any other type of computer damage, including sabotage or simple alteration of the data or information contained in a third-party computer system.
- Electronic fraud, including



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- phishing, pharming and any type of deception based on the use of information technology or social engineering.
- Spreading of rumours, criticism and boycotts through the Internet and social networks, including retweets and forwarding of messages of any kind.
- Industrial espionage through the Internet.
- Domain registration using third-party trademarks and company names.
- Child pornography.

All the physical or digital media that Diater makes available to its employees and collaborators are the property and ownership of the company. The use of such means is determined for strictly professional purposes, including email.

Behaviours that may endanger the security or integrity of the data held by the organisation or in its own information systems or those of third parties will be avoided.



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URBAN ORDER



Diater will manage the properties, the real estate operations and the construction, building and urbanisation initiatives, respecting the urban order and current regulations.



Diater will not carry out unauthorised urbanisation, construction or building works on land destined for roads, green areas, public domain assets or places that have had legal or administrative recognition of their landscape, ecological, artistic, historical or cultural value, or that for the same reasons have been considered under special protection.



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COMPLAINTS AND ENQUIRIES CHANNEL



Diater has a Channel for Complaints and Enquiries, which will allow all staff to send enquiries about said Code of Ethics with total confidentiality, as well as to report possible breaches or violations of this or other legal regulations.

The following address is established for this purpose, as an effective means of communication:

canaleticodiater@atcode.es

Communications will be received and processed by a specialised and independent team.

The identity of the informant will remain in the strictest confidence at all stages of the process.

It will not be disclosed to third parties, nor to the affected person, nor to company positions other than Senior Management, which will be the only body notified of the communication received.



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CONTROL AND SUPPORT BODY



Both the General Management and all those responsible for Diater are aligned with the objective of faithfully complying with the regulations in force at all times.



Specifically, Diater has created an internal management body called the Compliance Committee, which has specialised staff to manage any questions, queries or incidents that may arise from the application or monitoring of this Code of Ethics.