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Code of Conduct

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	22/06/2020	001	-Updating documents to the new document management platform and the new template.
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	16/06/2023	003	-Extension of the scope of the code of conduct to the entire Vitro Group (Vitro, S.A. plus subsidiaries). -Update section 9.3 "Whistleblower Channel" to include reference to this Channel Management Procedure Manual.

Contents

1 INTRODUCTION: MISSION AND VISION OF THE VITRO GROUP AND ITS SUBSIDIARIES 3

2 VITRO GROUP'S CODE OF CONDUCT 4

 2.1 Scope and application of the Code of Conduct 4

 2.2 How to get help and advice 5

 2.3 Do not remain silent 5

3 ACTION PRINCIPLES 6

 3.1 Honesty 6

 3.2 Impartiality 6

 3.3 Confidentiality of information, data protection and duty of secrecy 6

 3.4 Respect for the integrity of the person 7

 3.5 Conflict of interest 7

 3.6 Prevention of corruption 8

 3.7 Transparency and integrity of information 8

 3.8 Shareholder relations 8

 3.9 Financial information and transparency 8

 3.10 Protection of assets 9

 3.11 Respect for intellectual property 9

 3.12 Safety and health in the workplace 10

 3.13 Respect for the commitments made 10

 3.14 Prevention of money laundering and terrorist financing 10

 3.15 Public procurement process and unfair competition 10

 3.16 Environmental protection 11

 3.17 Use of public resources and taxation 11

 3.18 Loyalty and good faith 11

 3.19 Training 11

4 VITRO GROUP SHAREHOLDER BEHAVIOR CRITERIA 11

 4.1 Corporate governance 11

 4.2 Market information 12

 4.3 Control of confidential information 12

5 CRITERIA FOR BEHAVIOR TOWARDS VITRO GROUP EMPLOYEES 12

 5.1 Personnel recruitment 12

 5.2 Employment relationship 12

 5.3 Personnel management 12

 5.4 Safety and health in the workplace 12

6 VITRO GROUP'S CRITERIA FOR CUSTOMER BEHAVIOR 12

 6.1 Contracts and communication with clients 12

 6.2 Quality control and client satisfaction 13

7 CRITERIA FOR BEHAVIOR WITH VITRO GROUP SUPPLIERS 13

 7.1 Supplier selection 13

 7.2 Integrity and independence of relationships 13

 7.3 Ethical behavior in orders 13

8 CRITERIA FOR BEHAVIOR WITH OTHER VITRO GROUP INTERLOCUTORS 13

 8.1 Processing of information 13

 8.2 External communications 13

 8.3 Compliance with the Code of Ethics of the Healthcare Technology Sector 14

9 CODE GOVERNANCE 14

 9.1 Code approval 14

 9.2 Code responsibility 14

 9.3 Whistleblower Channel 14

 9.4 Non-compliance with the Code 15

1 INTRODUCTION: MISSION AND VISION OF THE VITRO GROUP AND ITS SUBSIDIARIES

VITRO GROUP is a group of companies belonging to the **biotechnology** sector that operates in the field of diagnostics and related services. **We are an organization oriented to the research, development, production and commercialization of research and diagnostic products** for laboratories of Anatomic pathology, Microbiology, Immunology and Molecular Biology. We also have a Clinical Laboratory of Anatomic Pathology Diagnosis and a microbiology laboratory. **VITRO GROUP**, with its products, is currently present in over 30 countries.

Founded in Seville in 1989, it has become one of the first groups in the country in the field of diagnosis and services related to healthcare and clinical laboratory instruments, as well as to the development of software for the location and management of medical diagnoses.

VITRO GROUP is determined to improve the health of every patient VITRO thus we work with high quality standards to achieve excellence in our products and services. It has a highly committed and qualified team to provide the best service and more efficient and precise diagnostic solutions adapted to each client, which has placed it as one of the main references in the market.

The mission of VITRO GROUP is to lead the national and international market of pathological anatomy, microbiology, immunology and molecular biology, improving the health of each patient by seeking excellence in its products and services, and promoting innovation and technological development nationally and internationally.

VITRO GROUP advocates a legal, regulatory and supervisory environment that is transparent and predictable, encouraging regulatory compliance and the highest standards of business ethics at all times.

In order to achieve our mission, we understand that the behavior of the personnel working in the **VITRO GROUP** should be guided by criteria of personal ethics, professional excellence and organizational responsibility.

Likewise, the values of **VITRO GROUP** should govern our behavior with our customers and suppliers, with equipment, and with third parties.

CORPORATE VALUES

- Commitment to Science and Innovation
- Vocation for customer service
- Collaboration
- Assertiveness
- Transversality
- Business ethics

2 VITRO GROUP'S CODE OF CONDUCT

2.1 Scope and application of the Code of Conduct

This Code of Conduct is of mandatory application and compliance for all the staff, management team and governing bodies of the **VITRO GROUP** as persons bound by it and regulates the daily performance of the work of all the people linked to the Company, gathering a series of rules, ethical principles and values.

Persons bound by the Code of Conduct must meet three requirements, namely:

- (i) know and comply with the standards of conduct set out in this Code and the ethical principles on which it is based,
- (ii) report situations of non-compliance, and
- (iii) cooperate with any internal or external investigation initiated in this matter.

It is important to bear in mind that the Code of Conduct does not contemplate all the situations or circumstances in which the members of the company may find themselves, but rather provides some general guidelines or directives that should orient their way of acting in the performance of their professional activity.

Therefore, in all situations that may arise, we must follow the principles set out in this Code of Conduct, avoiding any behavior that, although it does not violate the law, could damage the reputation of the company and negatively affect its interests, reputation and public image.

The existence of the Code does not replace the responsibilities of:

- Knowing and complying with the regulations in force at all times.
- Knowing and complying with internal policies and procedures that will complement and develop the content of this Code.
- Acting in accordance with general ethical principles with the diligence and transparency dictated by common sense and the good work of people, even though the Code does not cover behavior.
- Each liable party must act appropriately in situations arising from the activity by identifying the event, thinking before acting, evaluating the available alternatives and their consequences and consulting the persons responsible in order to finally decide how to act by determining their responsibilities, applying the principles and values set out in this Code and evaluating the risks to determine what can be done, if any, to minimize them.

The management of **VITRO GROUP** assumes the commitment of:

- Disseminating the Code among all regulated entities and in particular among their work teams.
- Leading by example.
- Supporting its work teams in the ethical and interpretative dilemmas that may arise from respect for the individual freedom of each subject obliged to comply.

The Code of Conduct will be notified personally to all the professionals who make up the company, expressly stating the obligation to comply with it in the employment contracts and those of other collaborating professionals, who will be given a copy when they join the company.

2.2 How to get help and advice

In our daily work, we may occasionally encounter situations not explicitly covered by the Code of Conduct. If we are not sure if a behavior is right, we should ask ourselves the following questions:

- Is my behavior legal?
- Does it conform to the values of **VITRO GROUP**?
- Does it comply with the Code of Conduct?
- Could it have negative consequences for any of the companies of the **GROUP** or for me?
- Would I feel comfortable if it were eventually published in the press?

Often, these questions will be enough to guide us. However, if doubts or uncertainties about appropriate behavior persist, help and advice should be sought. The **VITRO GROUP** promotes a culture in which questions can be asked openly with the fundamental aim of preventing behavior that does not comply with regulations.

In case of doubt, the Compliance Officer is the most appropriate contact person.

Similarly, the heads of each department are responsible for ensuring that all employees who are under their charge receive the necessary help and advice to comply with the Code of Conduct.

It is expected from all of us that:

- We contact our boss or the Compliance Officer.
- We offer help and advice to our team members.

2.3 Do not remain silent

VITRO GROUP's employees who speak up when they believe a violation may have occurred act correctly and in line with the **GROUP**'s values and our principles. **VITRO GROUP**'s management must be aware of any integrity issues in order to address them quickly and reliably. By reporting possible violations, the entity's employees help to protect themselves, their colleagues and the interests and rights of the **VITRO GROUP**.

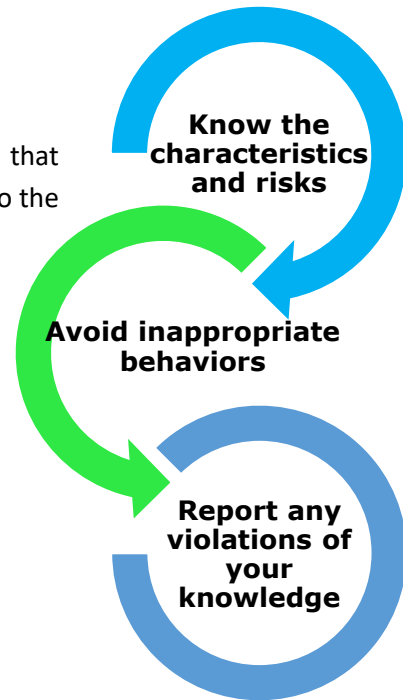
If we suspect a possible violation, it is usually best to contact our direct supervisor personally. If we feel uncomfortable about raising a suspected violation with our superior, we should contact the Compliance Officer, the Legal Department or the Human Resources area, or make use of the Whistleblower Channel, as well as any other procedure that has been enabled by the **VITRO GROUP**.

Any employee who reports a suspected violation in good faith is acting in the best interests of the **VITRO GROUP** and deserves credit for it. **VITRO GROUP** will not tolerate any retaliation against employees who report a possible violation in good faith. If anyone considers that this principle is not being complied with, they can and should make a complaint to the General Manager of the **VITRO GROUP**, the Compliance Officer, the HR Manager of the Group or any member of the Board of Directors.

VITRO GROUP's manager and department heads are expected to create an environment of trust that encourages employees to talk openly about possible violations.

It is expected from all people related to the **VITRO GROUP** that:

- We do not remain silent when we believe in good faith that someone has done, is doing or could do something contrary to the Code of Conduct.
- We raise the suspected violation with our superior, or
- We use the notification channels if we don't feel comfortable raising a suspected violation with our superior.
- We raise our voices if we learn that someone is being retaliated for reporting a possible violation in good faith.



3 ACTION PRINCIPLES

The values and principles incorporated into the actions of the **VITRO GROUP**, respected by all members of the company, are:

3.1 Honesty

All persons linked to the company act with respect for the law in force and human dignity, guaranteeing human rights and public freedoms.

All the activities developed by the company must be carried out in **strict compliance with the regulations in force and the guidelines set internally**, with priority and inexcusable compliance with the law, which implies, without exception, the obligation to always comply with the law in force and with internal policies and regulations.

No one, regardless of the position he holds in the company, is authorized to request another related person or third party to contravene the provisions of the Law and this Code and, consequently, he cannot justify a behavior contrary to the Law or the Code on the basis of a superior order or ignorance of the rule.

3.2 Impartiality

In decisions that influence relations with third parties or other related persons, prohibiting any discrimination on the basis of age, sex, health status, sexuality, nationality, political opinions and religious beliefs.

3.3 Confidentiality of information, data protection and duty of secrecy

The confidentiality of the information held by the company is guaranteed and it accepts the commitment not to discover or reveal reserved data, except in the case of express authorization and in accordance with current legislation applicable at all times.

In this sense, contractually, all persons bound by this Code must respect the confidentiality of all those matters and subjects that are known to them by reason of their professional work and their personal relationship in the field of work.

As a general rule, **all information received is confidential and must be used only for the purpose for which it is provided** and by the liable persons who legitimately need to make use of it for the performance of their duties.

The information received will not be disclosed to third parties, unless expressly authorized by the owner, legal or judicial requirement or any other case covered by current regulations.

In any case, the provisions in force regarding the protection of personal data must be complied with.

3.4 Respect for the integrity of the person

The company assumes as a fundamental value the respect to the person and its dignity, guaranteeing the physical and moral integrity of its employees and collaborators with working conditions that respect the individual dignity, the rules of socially correct behavior, good education and safe and healthy working spaces.

Respect will be the basis of all relationships, avoiding any type of verbal exchange or conduct - including jokes - that involves aggression or contributes to creating an intimidating work environment, avoiding any type of discrimination, humiliation or moral harassment. For this reason, no discrimination is permitted on the grounds of gender, race, age, nationality, religion, sexual orientation, disability, family origin, language, political ideology, political or trade union affiliation or any other characteristic not objectively related to working conditions or prohibited by the applicable legislation.

The company has zero tolerance for any form of harassment, and therefore does not condone, promote or protect any form of harassment, whether sexual, occupational or personal, or any **behavior that creates an intimidating, hostile, humiliating or offensive work environment**. If there is knowledge of any conduct that may constitute **discrimination, harassment or intimidation**, you are required to report it in accordance with this Code.



3.5 Conflict of interest

All persons connected with the company must prevent conflicts of interest, avoiding any particular benefit, direct or indirect, deriving from situations or circumstances that are conducive to the tasks entrusted to the company and that are detrimental to the legitimate interest of the company.

If the conflict of interest cannot be avoided, the obligated persons **must report it to the corresponding body of the VITRO GROUP, which is hierarchical superior, through the channels authorized** for this purpose, and must abstain from participating in the negotiation or operation in question.

Obligated persons must **refrain from using privileged information** to which they have had access as a result of the exercise of their professional activity. In addition, they are committed to promoting this principle among suppliers and clients.

The work should be carried out with the utmost professionalism, and gifts or perks should not influence behavior or services provided.

3.6 Prevention of corruption

The persons bound by this Code undertake to comply with current anti-corruption legislation and, in particular, **to behave scrupulously with regard to those activities that may be involved in cases of corruption**, whether between private individuals or with civil servants.

It is strictly forbidden to request or accept, directly or indirectly, advantages or favors, whatever their nature, for one's own and personal benefit, in order to influence the decision to establish, maintain or terminate a relationship or business with a third party, derived from or related to operations carried out by or on behalf of the company.

Likewise, it is strictly forbidden to promise or **offer to a third party, whether public or private, directly or indirectly, gifts, handouts or favors not authorized by the company**, whatever their nature and with the purpose of obtaining, getting or retaining a business or advantage in operations carried out by or on behalf of the company.

Exceptionally, **gifts with a symbolic economic value are considered acceptable, understanding as such those that do not exceed 10 euros**, or are promotional or courtesy gifts. In these cases, they should always be of a disinterested nature and should not seek to achieve a particular conduct, nor favorable treatment. Invitations may also be accepted within ordinary and customary social customs and within reasonable and modest limits.

In those cases in which the gift, attention or invitation exceeds 150 euros, it must be brought to the attention of the regulatory compliance body so that they act in accordance with internal rules.

3.7 Transparency and integrity of information

The persons bound by the Code provide complete, transparent, understandable and accurate information, so that when establishing relations with the company, those involved can make autonomous decisions, aware of the interests at stake, the alternatives and the relevant consequences.

3.8 Shareholder relations

The present and potential shareholder is a source of financing and a subject with opinions and investment preferences, and consequently, in order to adopt the most appropriate decisions in the social deliberations of the agreements, he must have all the relevant information available.

For this reason, **the company creates the necessary conditions so that the participation of the shareholders is wide and conscious**, guaranteeing the equality of information and marked by the commitments of transparency, veracity and correctness.

3.9 Financial information and transparency

The company is responsible for **providing reliable, accurate, complete and timely financial information on its financial status** and on those events that could have a significant impact on them.

Obligated persons have the duty to comply diligently with their tasks of recording and processing financial information, which form the basis of the process of preparing the Company's public financial information.

The obligated persons, each in their own sphere of responsibility, are the guarantors of the reliability, accuracy, integrity and updating of the financial information.

This responsibility is particularly important with regard to the data and reports that are necessary for the preparation of the company's financial statements, since their adequate recording and interpretation is essential to ensure the correct application of the valuation criteria corresponding to each accounting balance, transaction or contingency, as well as to decision-making.

3.10 Protection of assets

The persons bound by the Code must make responsible use, in accordance with the law, of the company's property, assets and facilities, which are made available for the performance of work, such as technology, materials, computers, telephones, e-mails, Internet access or any other instrument, device or tool, which must be used and handled with the utmost care and diligence and may only be used for the purposes that are proper and legitimate within the performance of the functions of the work field.

Obligated persons shall refrain from entering into commitments or establishing contractual relations on behalf of the company without following the established internal procedures. Additionally, liable persons **must refrain from using the image, trademark or other distinctive signs for uses other than those derived from their activity within the Company.**

In any case, the image, mark or other distinctive signs must be used in strict application of the internal rules established.

Goods and assets created for the **VITRO GROUP** within the framework of a business relationship for the provision of services or within the framework of an employment relationship, whether or not the resources thereof are used, are property of the **VITRO GROUP**, even after the end of the business or employment relationship by virtue of which they were created.

3.11 Respect for intellectual property

By discovering, developing and delivering innovative medicines and diagnostic products, we help treat serious and potentially life-threatening diseases. Given its business model, the **VITRO GROUP** depends on industrial property rights and their effective protection.

Intellectual property law protects the GROUP's valuable assets, namely our patents, trademarks, copyrights, trade secrets, domain names and other related rights.

VITRO GROUP supports initiatives to **promote a legal and regulatory environment that protects intellectual property rights**. In the same way, the entity is committed to respecting the intellectual property rights of third parties.

VITRO GROUP expects all its employees to take due account of the intellectual property rights of third parties in their daily work. In fact, whenever our intellectual property rights are infringed, **VITRO GROUP** will enforce these rights.

Violation of intellectual property rights not only damages VITRO GROUP's assets, but **in many cases also poses a threat to the health and safety of patients**. For example, counterfeit diagnostic products are not only illegal, but pose a major public health problem worldwide. **VITRO GROUP** applies appropriate measures against counterfeiting within its sphere of influence.

3.12 Safety and health in the workplace

The company works for a good workplace to generate a safe, healthy and caring working environment for the welfare of people, being a priority of the company, with the commitment to request contractually rigorous compliance with health and safety standards, both for its own activities, as well as those outsourced to third parties.

3.13 Respect for the commitments made

The persons bound by the Code must act with efficiency and resolution, optimizing economically and environmentally the available resources without generating unnecessary administrative delays or obstacles, fulfilling our relationship in respect, transparency and compliance with the commitments made.

The activities carried out by the liable persons must also be done in a responsible manner, trying to respond to the following principles:

- To recognize and respond to the own and others' concerns.
- To constantly improve the performance over time and the own resources of the position being held.
- To timely report of anomalies that are generated voluntarily or involuntarily.
- To plan in time and form the different actions that make up a general activity and warn about existing deficiencies in planning or monitoring.
- To assume the consequences that the omissions and behaviors generate in the person, the environment, the life of others and the resources assigned.
- To treat with respect and resolve complaints and claims made by third parties in order to constantly improve the quality of the service provided.

3.14 Prevention of money laundering and terrorist financing

Persons subject to this Code, and principally those involved in the economic management of business units and the processing of orders, will immediately report to the Regulatory Compliance Body any fact that leads them to suspect the possible existence of typical money laundering behavior.

In this regard, all collections and payments made in cash or through payment systems where there is suspicion about the identity of the sender or recipient will be subject to the regulations in force and will always be duly identified.

3.15 Public procurement process and unfair competition

Vitro GROUP competes in the market in a loyal way, without admitting in any case deceitful, fraudulent or malicious conduct. Similarly, persons affected by the Code will reject any information about competitors obtained in an improper manner or in violation of the confidentiality under which it is submitted by its owners.

In this sense, the company defends the principles of fair competition, refraining from collusive, predatory or abuse of power behavior.

When any of the companies of the GROUP participates in Bidding or Public Procurement Processes, presenting itself to contracting procedures before administrations or public entities, it will comply at all times with the regulations and standards applicable to each process.

3.16 Environmental protection

VITRO GROUP and its team are actively and responsibly committed to preserving the environment, respecting legal requirements, following the recommendations and procedures established to reduce the environmental impact of its activities and contributing to improving the sustainability objectives set by management.

3.17 Use of public resources and taxation

VITRO GROUP will ensure that, where appropriate, public funds and aid requested or received from public administrations will be put to the proper use for which they were granted, and that the application is transparent, rigorous and truthful.

The GROUP will at all times comply with tax regulations, avoiding practices that involve illegal tax evasion to the detriment of the public purse.

3.18 Loyalty and good faith

The actions of obligated persons will at all times conform to the principles of loyalty and good faith.

Loyalty requires that all persons subject to this Code act with honesty and objectivity with respect to each situation that may result in a consequence for their colleagues or third parties.

Honesty requires respect for the dignity of persons and their essential rights, and that one acts with consideration for the consequences of an act, minimizing the harmful consequences it may have, without putting personal interests, which otherwise would have led to other behavior, first in the resolution.

Objectivity in the actions of obligated persons must be supported by observable, verifiable and, whenever possible, quantifiable criteria, which prevent them from being the source of different decisions depending on the subject person acting at each moment.

Good faith requires that one acts with the sincere conviction of being assisted by reason and with sufficient and proper information to make every decision and act at every moment.

3.19 Training

VITRO will devote resources to raise awareness and sensitize all people involved to prevent and eradicate behavior contrary to the values of the company, being an essential part of its success.

4 VITRO GROUP SHAREHOLDER BEHAVIOR CRITERIA

4.1 Corporate governance

At the **VITRO GROUP**, corporate **governance is actively practiced to ensure effective management and control of activities**, inspired by the highest standards of transparency and correctness in business management.

In this sense, the governing structures are defined in the statutes and are integrated in the General Meeting of Shareholders and the Board of Directors.

The parent company, as well as its main subsidiaries, are audited by reviewing the financial statements for the year with total transparency and in strict compliance with current regulations.

4.2 Market information

The GROUP offers all the necessary information for the decision making of the investors with an understandable language, a comprehensive and timely nature so that they have the necessary information to understand the business strategies and the management development.

4.3 Control of confidential information

The **company protects its confidential and reserved information** by applying a specific protocol that serves to manage and treat the company's information.

5 CRITERIA FOR BEHAVIOR TOWARDS VITRO GROUP EMPLOYEES

5.1 Personnel recruitment

Personnel recruitment will be carried out according to the business needs and profiles of the candidates, respecting the principle of equal opportunities for all interested subjects.

The candidate's information provided will only be used to check aspects related to the capacities, professional profile or aptitudes of the vacancy to be filled.

5.2 Employment relationship

All personnel will be hired under the corresponding labor contract modality, registered with Social Security and rejecting any type of irregular practice in this sense.

In the same way, the **VITRO GROUP** aims to create a stable and committed framework of human and labor relations within the organization, in which trust prevails.

5.3 Personnel management

The company does not allow discrimination in the management of the personnel, being carried out with the criteria of protection to the privacy of the data provided.

5.4 Safety and health in the workplace

VITRO GROUP is committed to the **health of its workers and undertakes to disseminate and consolidate a culture of safety and health at work** in the face of the risks inherent in the performance of each employee, developing all necessary preventive actions in accordance with the occupational risk prevention plan.

6 VITRO GROUP'S CRITERIA FOR CUSTOMER BEHAVIOR

6.1 Contracts and communication with clients

Contracts and communications with clients (including advertising) must comply with the following requirements:

- They must be clear and intelligible, formulated in a language as close as possible to that which is customary in the sector.
- The prices as a company will always be without VAT, but specifying that the VAT will have to be increased in the invoice. Exceptionally, when circumstances so require or specify, such as in public tenders, the offer may incorporate VAT, in which case it will be expressly indicated as including VAT.
- They will not have elusive or illegal clauses.
- They must be complete, so that no relevant element is overlooked.

The company's style of behavior with its clients is characterized by availability, respect, courtesy and compliance with the laws in force at all times.

6.2 Quality control and client satisfaction

The company commits itself to guarantee adequate quality standards of the services and/or products offered in the information previously provided and object of contracting.

7 CRITERIA FOR BEHAVIOR WITH VITRO GROUP SUPPLIERS

7.1 Supplier selection

VITRO GROUP has created **purchasing processes to seek the greatest competitive advantage, ensuring equal opportunities among all suppliers.** Without prejudice to the procedures established for the selection of suppliers, the persons subject to this Code:

- a) They will refrain from entering into any contract with suppliers of dubious reputation, who are known to have engaged in irresponsible labor practices, or with whom they have been convicted or are being prosecuted for corruption.
- b) These suppliers will endeavor to hire their respective workers in compliance with the legislation in force, refraining from operating with those who are known to have violated internationally recognized human rights, especially with regard to the hiring of child labor, forced labor or labor performed under coercion.
- c) They must allow and encourage the concurrence of offers and evaluate the most interesting ones for the group and its subsidiaries with objectivity and transparency.
- d) It must be ensured that no personal or family interests of the partners and/or employees involved in the decision are involved in the assignment of a contract to a supplier.

7.2 Integrity and independence of relationships

VITRO GROUP maintains business relationships with its suppliers based on business integrity and independence.

7.3 Ethical behavior in orders

The GROUP may request from certain relevant suppliers, the existence of a code of ethics with values and culture of compliance in the style of the present, in addition to requesting accreditation of certain legal obligations, including, among others, compliance with tax and Social Security obligations.

8 CRITERIA FOR BEHAVIOR WITH OTHER VITRO GROUP INTERLOCUTORS

8.1 Processing of information

The company processes the information of the parties involved with **absolute confidentiality** and **preserving the privacy of any individual involved.**

8.2 External communications

The GROUP's communication in the media of any kind is **characterized by respect for the right to information and freedom of expression**, although it is contractually prohibited to disseminate false or biased comments.

All communications activities will respect laws and self-regulatory practices, and will be conducted with clarity, transparency and opportunity; safeguarding, among other things, price-sensitive information and trade secrets.

Any form of pressure or preferential treatment by the media will be avoided.

8.3 Compliance with the Code of Ethics of the Healthcare Technology Sector

The parent company, as an associate of FENIN, is obliged to comply with the provisions of the Code of Ethics of the Healthcare Technology Sector, which mainly regulates the relations of Companies in the healthcare technology sector with Health Professionals, patients and healthcare organizations in Spain, regardless of the country where they carry out their professional activity, as well as the relations of Companies with Spanish Health Professionals, patients and Health Organizations in activities abroad.

VITRO GROUP will train its employees in the contents of the Code of Ethics of the Healthcare Technology Sector and will adapt and develop its protocols and internal policies in coordination with it. All employees should be aware of the contents of this Code and apply it in the absence of internal guidance. Any questions raised by the Code should be consulted with the Compliance Officer.

9 CODE GOVERNANCE

9.1 Code approval

The Code is in continuous improvement that evolves with the present times without leaving aside the fundamental pillars that inspire our ethics as a Company, whose principles and values inspire it.

The approval of the Code corresponds to the **Administrative Body of the Company**.

9.2 Code responsibility

Responsibility for the Code lies with the Compliance Officer who has the following competencies:

- The writing and maintenance of versions of this Code.
- To promote the dissemination, knowledge and compliance with the Code.
- The publication and making available of this Code to obligated persons.
- To promote, in coordination and with the collaboration of the corresponding departments or areas, the training actions that are considered necessary for the knowledge of the Code by all the people bound.
- To ensure compliance with the Code, to take cognizance of breaches of the Code and to propose to the Administrative Body for its eventual adoption, the corrective measures and sanctions that correspond to the workers, or those that apply, as the case may be, to the contracted workers.
- To resolve any doubts that may arise in their interpretation.
- To ensure that no reprisals are taken against those who use the Whistleblower Channel.
- To harmonize existing procedures in line with this Code in a timely manner.
- To produce an annual report on reported incidents relating to the Code.

9.3 Whistleblower Channel

The Whistleblower Channel is a means of reporting suspected conduct contrary to the Code of Conduct.

This Whistleblower Channel is an **essential part of VITRO GROUP's compliance system**, as one of the processes established to guarantee the effective application of the regulations and guidelines of this Code.

For this purpose, employees and any other person may report a breach of the values and conduct set forth in the Code through the websites of each of the VITRO GROUP companies, by filling in the requested information.

Communications received in the Whistleblower Channel will be handled diligently and promptly, **in a confidential manner and protecting the interests of the complainant**, promoting their verification and promoting measures for their resolution, in accordance with the Whistleblower Channel management procedures established by the Compliance Officer.

All relevant information regarding the Whistleblower Channel (scope of application, communication channels, operation, persons responsible, etc.) is available in the document [IT-00357 "Whistleblower Channel Management Procedure Manual"](#).

9.4 Non-compliance with the Code

Any person who becomes aware of a possible breach of the Code **must report it through the Whistleblower Channel**.

All VITRO employees have the duty to cooperate in investigations of possible breaches of the Code or its complementary documents.

Failure to comply with any of the criteria for action contained in this Code of Conduct **may be punished in accordance with the legal disciplinary regime in force**, without prejudice to any other consequences or responsibilities that the offender may have incurred. The most serious offenses and, in particular, the violation of the principles of action defined in this Code or in the Code of Ethics of the Healthcare Technology Sector, may result in disciplinary dismissal or the termination with cause of contracts with collaborators, suppliers and/or clients.

Disciplinary measures for violations of the Code of Conduct will be taken by the corporate general manager and, where appropriate, by the Administrative Board in the most serious cases where there may be evidence that a criminal offense has been committed.

Disciplinary proceedings will be conducted in accordance with the following procedure:

- Opening and documentation of the proceeding as soon as the facts are known by any means. This file will be drawn up between the HR department and the Compliance Officer.
- Hearing of the interested party within two (2) days. If there are indications that a crime has been committed, the Compliance Officer with the external legal advisors may suspend the hearing of the person concerned.
- Proposal of sanction by the HR department and which will be submitted to the general management for ratification or, if appropriate, for submission to the Board of Directors.
- Finally, the person concerned will be informed of the conclusion of the proceeding and its disciplinary consequences.

The application of the disciplinary regime will be carried out in accordance with the applicable labor regulations and the procedure set out above.

Disciplinary measures may be imposed on the person/persons committing the offense, as well as on those who have approved the commission of the offense or fail to take appropriate action to correct the deficiencies or the complaint with knowledge of the existence of an offense.