

CODE OF ETHICS AND GOOD PRACTICES HEALTHCARE ACTIVOS MANAGEMENT, S.L.U.

This Code has been approved on March 26th of 2019.

SUMMARY

The purpose of this Code of Ethics and Good Practices (hereinafter referred to as the "**Code**") is to ensure professional, ethical and responsible behaviour by HEALTHCARE ACTIVOS MANAGEMENT, S.L.U. (hereinafter, the "**Company**") and all its employees, in the performance of its activities. To this end, the principles and values that should govern the Company's relations with its interest groups (employees, clients, partners, managed companies and suppliers) are defined. To this end, the Code:

- It establishes the principle of due diligence for the prevention, detection and eradication of irregular conduct, whatever its nature, including, among others, the analysis of risks, the definition of responsibilities, the training of employees and, where appropriate, third parties directly related to the Company, and the formalization of procedures, especially for the notification and immediate elimination of irregular conduct.
- It takes into account the principle of criminal liability of legal persons, as set out in the legal system, and prevents and proscribes the existence of behavior that could determine the liability of the Company.

A. General Principles

The Code is defined as an ethical commitment that includes basic principles and standards for the proper development of relations between the Company and its main stakeholders wherever it carries out its business activities. The Code is based on the following principles:

1. All the Company's operations shall be carried out under an ethical and responsible prism.
2. Compliance with the legislation in force is a necessary and unavoidable requirement of the Code.

3. The behavior of the Company's directors and employees will go in accordance with the spirit and letter of the Code.
4. All individuals and legal entities that maintain, directly or indirectly, any labor, economic, social and/or industrial relationship with the Company shall be treated fairly and with dignity.
5. All the Company's activities will be carried out in the most environmentally friendly way, favoring the conservation of biodiversity and the sustainable management of natural resources.
6. No person employed by the Company shall be discriminated against on the basis of race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality or gender. The Company prohibits any form of physical, sexual, psychological or verbal abuse or harassment of its employees, as well as any other conduct that could create an intimidating, offensive or hostile work environment. The Company's employees have the right to organize, freedom of association and collective bargaining. Weekly working hours and overtime will not exceed the legal limit established by applicable legislation. Overtime shall always be voluntary and paid in accordance with the law.
7. The salary received by the Company's employees is in accordance with the function performed, always respecting the applicable agreement. All the Company's employees carry out their work in safe and healthy places.
8. The Company is committed to offering all its customers a high standard of excellence, quality, health and safety in its services, and to communicate with them in a clear and transparent manner. These services will be provided in an ethical and responsible manner.
9. The Company carries out its activity in accordance with the social interest, understood as the viability and maximization of the value of the company in the long term in the common interest of all the partners.
10. The Company extends to its business partners the obligation to comply with this Code.
11. All suppliers of goods and services of the Company shall comply with the Code insofar as it is applicable to them. They must also

allow any review by the Company or authorized third parties to verify their compliance.

B. Compromisos de Conducta y Prácticas Responsables

- Compliance with applicable legislation and the Company's internal regulations.
- Duty of loyalty and transparency with respect to the companies managed by the Company.
- Compliance with contracts signed by the Company.
- Dignified and respectful treatment of customers and suppliers.
- Objective, clear and truthful promotion of the services offered by the Company.
- Prohibition of unfair market practices.
- Strict control of cash payments or receipts.
- Prohibition of giving or receiving gifts.
- Prohibition of obtaining undue tax advantages.
- Prohibition to act on behalf of the Company in case of conflict of interest.
- Prohibition to use the goods, data and services of the Company for one's own benefit.
- Strict duty of confidentiality and protection of its content in relation to all information handled by the Company.
- Prohibition to use the works, creations or other signs of third parties protected by copyright, patents, trademarks, domain names, reproduction or design rights and business secrets.
- Prohibition of insider trading.
- Duty of information regarding the commercial, professional, reputational and remuneration suitability of suppliers proposed to be hired by the Company.

- Limitations and control of meals, expenses and gifts that may be paid to or received by Company employees from third parties in the course of their work, as well as charitable donations.
- In the use of the media, the obligation to respect the principles of legality, authenticity, transparency, belonging, confidentiality, control and supervision.

C. Compliance with the Code

The administrative body is responsible for ensuring compliance with the Code. The administrative body may act on its own initiative or at the request of any employee of the Company, or of a third party with a direct relationship and legitimate commercial or professional interest, by means of a report made in good faith.

All Company employees must respect and promote respect for the Code and, if there is no other way to resolve the conflict, must report any practice that violates these principles and rules through the Ethical Mailbox.

The Company has a mailbox and an e-mail address ("**Ethical Mailbox**") in order to promote compliance with the law and the ethical standards and good practices established in the Code. The use of the Ethical Mailbox (or the e-mail address) is without prejudice to any other means that may be considered appropriate to allow the communication of irregularities that occur within the Company.

The Ethical Mailbox and/or e-mail address is a transparent channel for communicating, by employees or third parties, practices that may involve the commission of any irregularity or any act contrary to the law or the rules of conduct of the Code.

Communications to the Ethical Mailbox can be sent by email to the following address: buzonetico@healthcareactivos.com. All information sent to the "ethical mailbox" and/or the above-mentioned e-mail address will be received directly and immediately by the administrative body, which must decide within 48 hours what measures to take to investigate. Likewise, in the event that it is found that there are indeed breaches, it must adopt, as soon as possible, the means to correct the actions and/or behavior that are contrary to the Code.

Employees or third parties who have reasonable grounds for suspecting that an irregularity has been committed or that an act contrary to the law or the Code's rules of conduct has been committed that could not have

been resolved by any other means must notify the company through the Mailbox and/or the ethical e-mail.

In any case, the ethical mailbox and/or email must be used in good faith and, in particular, such communications must always meet the criteria of truthfulness, and this mechanism may not be used for purposes other than those that pursue compliance with the rules of the Code.

The identity of the person who communicates an anomalous action through the Ethical Mailbox and/or email will be considered confidential information and, therefore, will not be communicated to the denounced without the consent of the denouncing party, thus guaranteeing the reservation of the identity of the denouncing party and avoiding any type of response to the denounced party as a consequence of the denunciation, provided that this has been carried out in accordance with the criteria of veracity and proportionality established in the Code.

The Company undertakes not to adopt any form of retaliation against employees or third parties who have communicated through the Ethical Mailbox or email one of the actions referred to in the previous section by the mere fact of having made such communication and provided that it has been made in accordance with the criteria of truthfulness and proportionality established in the Code.

Without prejudice to the foregoing, the details of the persons making the communication may be provided both to the administrative or judicial authorities, to the extent that they are required by those authorities as a result of any proceedings arising from the subject matter of the complaint, and to the persons involved in any subsequent investigation or legal proceedings initiated as a result of the investigation. Such transfer of data to the administrative or judicial authorities shall always be made in full compliance with the legislation on the protection of personal data.

The rights to privacy, defense and the presumption of innocence of persons under investigation shall be guaranteed in all investigations.

The information and personal data provided through the Ethical Mailbox and/or email will be treated at all times as confidential and in compliance with applicable data protection legislation. Such information will only be disclosed to those employees who need access to such information.

In general, the accused will be informed of the existence of a complaint at the time the investigation is initiated. However, in cases where there is a significant risk that such notification will jeopardize the ability to effectively investigate the allegation or to collect the necessary evidence, notification of the complainant may be delayed while such risk exists. In

any event, such delay shall never exceed three months from the receipt of the complaint.

Persons making a communication through the Ethical Mailbox and/or email must ensure that the information provided is true, accurate, complete and up-to-date. In any case, the data that are processed in the framework of investigations will be cancelled as soon as these have been completed, unless administrative or legal proceedings result from the measures taken.

The company will develop the necessary measures for the effective implementation of the Code. No one, regardless of his or her level or position, is authorized to request that an employee or professional commit an illegal act or act in violation of the Code. In turn, no professional may justify an improper, illegal or otherwise unethical professional practice on the basis of an order from a superior.

When the Company detects that a professional/employee has carried out activities that contravene the law or the Code, it will proceed to apply the disciplinary measures in accordance with the regime of offences and sanctions provided for in the collective agreement or in the applicable labor legislation.

The Code will be made available to all employees, will remain published on The Company's website (www.healthcareactivos.com) and will be the subject of appropriate communication, training and awareness actions for its timely understanding and implementation throughout the organization.

Company employees know, understand and expressly accept the contents of the Code. Employees who join or become part of the Company in the future will expressly accept the vision, values and standards of performance set forth in the Code. The Code will be attached to the respective employment contracts.