

THIRD PARTY

Code ^{of} **Ethics**

NEURAXPHARM



The right
mindset

Acting with integrity
NEURAXPHARM®

THIRD PARTY
CODE OF ETHICS

Contents

CHAPTER I

PURPOSE

4

CHAPTER II

SCOPE OF APPLICATION

4

CHAPTER III

NEURAXPHARM'S GUIDING PRINCIPLES OF CONDUCT

5

CHAPTER IV

PRINCIPLES OF ACTION

5

ARTICLE 4.1. Respect for the Law, Human Rights and Ethical Values

5

ARTICLE 4.2. Respect for People

6

ARTICLE 4.3. Professional Development and Equal Opportunities

7

ARTICLE 4.4. Offering Suitable Work

7

ARTICLE 4.5. Corruption and Bribery

7

ARTICLE 4.6. Money Laundering

8

ARTICLE 4.7. Conflicts of Interest

8

ARTICLE 4.8. Occupational Health and Safety

9

ARTICLE 4.9. Respect for the Environment

10

CHAPTER V

ACCEPTANCE OF, ADHERENCE TO AND COMPLIANCE WITH THE CODE

10

CHAPTER VI

COMPLIANCE

10

CHAPTER VII

VALIDITY AND APPROVAL

11

CHAPTER

Purpose

Neuraxpharm considers suppliers, customers, contractors and external collaborators to be key for growth and offering improved quality of service. It seeks to establish relationships with them based on trust and mutual benefit.

Neuraxpharm's Code of Ethics for Suppliers and Customers (the 'Code') is an extension of [Neuraxpharm's Code of Ethics](#). Its purpose is to establish guidelines ethical standards for suppliers, customers, contractors and external collaborators in accordance with Neuraxpharm's corporate culture and regulatory system, and in line with the laws of each of the countries where Neuraxpharm operates, respecting the values of their respective cultures.

The Code reflects the principle of due diligence to be applied by suppliers, customers, contractors and external collaborators to prevent, detect and eradicate irregularities related to breaches of this Code and the internal rules they may have, including those relating to criminal actions.

Neuraxpharm is committed to promoting and encouraging its suppliers, contractors, customers and external collaborators to adopt practices in

accordance with the guidelines contained in this Code, notwithstanding their obligation to comply with contractual conditions.

Neuraxpharm will ensure that suppliers, customers, contractors, and external collaborators are familiar with and understand this Code and are able to commit to implementing it.

CHAPTER

Scope of Application

This Code is intended for all suppliers, customers, contractors and external collaborators doing business with Neuraxpharm.

Compliance is independent of wherever suppliers, customers, contractors and collaborators operate, notwithstanding their obligation to comply with the institutional and legal framework of each country.

The standards of conduct contained in this Code do not aim to cover every situation or circumstance which Neuraxpharm's suppliers, contractors, customers and external collaborators might encounter, but rather to set out general conduct guidelines to apply when conducting their business activity.

CHAPTER



Neuraxpharm's Guiding Principles of Conduct

Neuraxpharm believes that the trust of its customers, suppliers, contractors and external collaborators, as well as that of the social environment in which it operates, is based on the integrity and responsibility with which each of its employees performs their work.

Integrity is defined as ethical and honorable actions carried out in good faith. Professional responsibility is defined as proactive, efficient actions focused on excellence, quality and good service.

Neuraxpharm expects all of its employees to perform their roles with integrity and responsibility. Neuraxpharm also expects its suppliers, customers, contractors and external collaborators to act in accordance with these principles.

All of Neuraxpharm's external suppliers, customers, contractors and collaborators wishing to report any violation of the Code observed while carrying out their roles can contact Neuraxpharm's Ethics and Compliance Committee confidentially, in good faith and without fear of reprisal. These reports may be submitted via Neuraxpharm's Ethics and Compliance channel: [Ethics and Compliance - Neuraxpharm](#)

All reports submitted to the Ethics and Compliance Committee will be treated confidentially and in accordance with the provisions set out in current data protection legislation

CHAPTER



Principles of Action

ARTICLE 4.1.

RESPECT FOR THE LAW, HUMAN RIGHTS AND ETHICAL VALUES

Neuraxpharm is committed to always acting in accordance with applicable laws, with the internal regulatory system based on internationally accepted ethical practices, and with full respect for human rights and civil liberties.

All suppliers, customers, contractors and external collaborators must comply with the laws in force in the countries where they do business, obeying their spirit and purpose and behaving ethically in all their actions.

Suppliers, contractors, customers and external collaborators must also avoid any conduct that, even if not unlawful, may damage

Neuraxpharm's reputation in the eyes of the community, national governments or other bodies, and that could have a negative effect on the company's interests.

Suppliers, contractors, customers and external collaborators must act with honesty and integrity in all their engagements and transactions with the authorities and public officials of different governments and administrations, ensuring that all the information and certifications they provide, as well as the statements they make, are true.

All suppliers, customers, contractors and external collaborators must be familiar with, and abide by, the laws pertaining to their work.

No supplier, customer, contractor or external partner will deliberately collaborate with third parties to violate any law, nor will they participate in any action that could compromise respect for the principle of legality.

Suppliers, customers, contractors and external collaborators must ensure that their employees have the necessary means to always be aware of the relevant external and internal regulations they must comply with when carrying out their roles and establish all the necessary internal control frameworks to ensure compliance with the law and ethical values.

Suppliers, customers, contractors and external collaborators must always observe and ensure compliance with human rights, in particular those relating to:

I. *Eliminating any form or modality of forced or compulsory labour.* Suppliers, customers, contractors and external collaborators must promote and adopt the necessary measures in their organization to eliminate any form or modality of forced or compulsory labour.

II. Suppliers, customers, contractors and external collaborators must acknowledge the right of their employees to resign from their jobs with reasonable notice.

III. *Not permitting child labour.* Suppliers, customers, contractors and external collaborators must expressly reject child labour within their companies, respect the minimum age for recruitment as per applicable laws, and must provide means for enforcement. Neuraxpharm considers that the minimum working age is that set out in Convention 138 of the International Labour Organization (ILO).

ARTICLE 4.2.

RESPECT FOR PEOPLE

Professional respect.

Neuraxpharm rejects any manifestation of physical, psychological or moral harassment, or abuses of authority, as well as any other conduct that could create an intimidating or offensive environment in relation to the rights of individuals and their freedom of expression.

Suppliers, customers, contractors and external

collaborators must treat their employees with dignity and respect, foster cordial relationships and ensure a pleasant, healthy and safe working environment. Under no circumstances will any form of harassment or intimidation be tolerated. Relationships between the group's employees and those of suppliers, contractors and external collaborators must be based on professional respect and mutual cooperation.

Respect for the right to freedom of association and collective bargaining.

Suppliers, customers, contractors and external collaborators must respect their employees' freedom of association and the right to collective bargaining, subject to the rules applicable in each case and without fear of reprisal. Employee representatives must be protected against discrimination of any kind and must be free to fulfil their roles as representatives in their place of work.

ARTICLE 4.3.

PROFESSIONAL DEVELOPMENT AND EQUAL OPPORTUNITIES

Neuraxpharm rejects any type of discrimination in the workplace on the grounds of age, race, color, gender, religion, political opinion, nationality, social status or disability. Furthermore, Neuraxpharm supports the integration of disabled people and the implementation of public policies that are aimed at promoting more equal opportunities and fostering a corporate culture based on merit.

In the same way that Neuraxpharm does, suppliers, customers, contractors and external collaborators, must promote equal opportunities with regard to hiring, remuneration, access to training, promotion, professional development, equal opportunities, termination of contract and retirement.

ARTICLE 4.4.

OFFERING SUITABLE WORK

Neuraxpharm guarantees suitable work for all its employees. Similarly, suppliers, customers, contractors and external collaborators must pay decent salaries to their employees according to their skills, obligations and roles, in line with applicable laws and the market conditions in which they operate.

In each of the places in which they operate, employees must be guaranteed the right to rest, and applicable employment legislation about working hours and rest periods must be observed.

ARTICLE 4.5.

CORRUPTION AND BRIBERY

Corruption and bribery occur when employees, suppliers, contractors, customers and external collaborators make use of unethical practices to obtain an advantage for the company or for themselves. Corruption and bribery are classified as fraud.

Neuraxpharm has an Anti-Bribery and Anti-Corruption Policy that defines the principles

to be followed to prevent this kind of risk. Neuraxpharm expects its suppliers, customers, contractors and external collaborators to commit to and be responsible for ensuring compliance with the principles of the Neuraxpharm's Anti-Bribery and Anti-Corruption Policy.

Neuraxpharm's suppliers, customers, contractors and external collaborators, in their dealings with third parties and with authorities and public bodies in the different countries where they operate, must act in accordance with national and international provisions for the prevention of corruption and bribery and those of the countries in which Neuraxpharm operates, as well as the Organization for Economic Cooperation and Development (OECD).

Neuraxpharm opposes any attempt to influence the will of third parties to obtain an advantage using unethical practices. Nor does it allow other people or bodies to use such practices with their employees.

ARTICLE 4.6.

MONEY LAUNDERING

Neuraxpharm has policies in place to prevent and avoid irregular payments and money laundering which may arise from illegal or criminal activities during its operations.

Suppliers, contractors, customers and external collaborators must adopt measures to prevent money laundering in financial transactions – for both collections and payments – as well as being alert to cases where there might be a lack

of integrity by people or bodies with whom they conduct business.

ARTICLE 4.7.

CONFLICTS OF INTEREST

Conflicts of interest arise in circumstances where the personal interests of Neuraxpharm's employees or the employees of its suppliers, customers, contractors or external collaborators, directly or indirectly, are contrary to or in conflict with Neuraxpharm's interests, interfere with the honest fulfilment of their professional roles and responsibilities, or personally involve them in Neuraxpharm's financial operations or transactions.

Situations that may give rise to a conflict of interest include the participation of employees, family members or close associates of suppliers, contractors or external collaborators in Neuraxpharm's governing bodies or organisational structure.

Neuraxpharm considers that its relationship with its employees, suppliers, contractors, customers and external collaborators should be based on loyalty stemming from mutual interests.

Suppliers, contractors, customers and external collaborators must avoid situations that may give rise to a conflict between the personal interests of their employees and those of Neuraxpharm. They must implement mechanisms which guarantee the independence of the supplier's actions and full compliance with applicable laws

in the event of a potential conflict of interest involving any of their employees

ARTICLE 4.8.

OCCUPATIONAL HEALTH AND SAFETY

Neuraxpharm promotes the adoption of occupational safety and health policies, and adopts the preventive measures set out in current legislation in each country, always ensuring compliance with applicable regulations.

The company also promotes and fosters the application of its occupational safety and health rules and policies by the collaborators and suppliers with which it operates.

Neuraxpharm deems safety to be the responsibility of the individual and a condition of employment, and any unsafe behavior that could cause serious harm to people and/or property .

The suppliers, contractors, customers and external collaborators with whom Neuraxpharm works must – with the aim of preventing accidents and injury in the company and that of their subcontractors – endorse Neuraxpharm’s commitments to health and safety in the workplace.

These commitments include:

I. Guaranteeing that health and safety

are non-delegable roles, and that they are taken on by senior management via a visible commitment, proactively accepted and mainstreamed across the entire organisation, as well as by our suppliers and collaborators.

II. Establishing health and safety as an individual responsibility and as a condition of employment at Neuraxpharm and of the activity of its collaborators.

III. Ensuring that any potential situations of risk that may affect employees, customers, the general public and the safety of property are brought to attention, assessed and managed as appropriate.

IV. Establishing learning as a driver of change towards a culture of safety by offering continual training, accident and incident analysis, and the dissemination of lessons learnt.

V. Mainstreaming strict health and safety criteria into business processes, new projects, activities, facilities, products and services, as well as in the selection and assessment of suppliers and collaborators; non-compliance with this will condition the commencement or continuity of their activity.

VI. Providing the necessary resources and means to enable compliance with established safety standards at all times.

ARTICLE 4.9.

RESPECT FOR THE ENVIRONMENT

Environmental conservation is one of Neuraxpharm's top priorities. As a result, an environmental management system in Neuraxpharm's production plants is implemented.

Suppliers, contractors, customers and external collaborators must uphold a constant commitment to protecting the environment, and must comply with the guidelines and requirements set out in applicable local and international laws.

They must also undertake to comply with the environmental standards set out by Neuraxpharm, including, where appropriate, measures to reduce and offset any impact that may be necessary to apply such standards.

CHAPTER

V

Acceptance of, Adherence to and Compliance with the Code

Neuraxpharm must communicate and disseminate the contents of this Code to its suppliers, customers, contractors and external collaborators.

Suppliers, customers, contractors and external collaborators must formally agree to comply with this Code when hired by Neuraxpharm, whenever their contracts are modified, and in all other circumstances determined by Neuraxpharm.

CHAPTER

VI

Compliance

Compliance with this Code is mandatory for all of Neuraxpharm's suppliers, customers, contractors and external collaborators.

Neuraxpharm expects a high level of commitment from its suppliers, customers, contractors and external collaborators in complying with this Code.

Breaches of the Code will be dealt with in accordance with internal procedures, legal regulations and existing agreements and, when necessary, the appropriate penalties will be applied.

Neuraxpharm will terminate business dealings with suppliers, customers, contractors and external collaborators who violate the guidelines of behaviour set out in this Code, particularly those relating to human rights, corruption, and child labour. Depending on the nature and severity of the breach, and in order to help improve the way these issues are managed,

Neuraxpharm will examine the causes of the breach together with any supplier, customer, contractor or external partner company involved and promote the implementation of appropriate corrective actions in order to avoid terminating the contract.

Any questions arising about the interpretation or application of this Code of Ethics must be addressed to the procurement/contracting units via the usual communication channels [Ethics and Compliance - Neuraxpharm](#).

CHAPTER

VII

Validity and Approval

The Code of Ethics for Suppliers, approved by Neuraxpharm's Ethics and Compliance Committee, comes into force for all suppliers, customers, contractors and external collaborators the day it is published, and will remain in force until its cancellation is approved.



THIRD PARTY
CODE OF ETHICS