

COMPLIANCE POLICY RIBERA SALUD GRUPO





Ribera Salud Group hopes to succeed in the field of healthcare management by being an integral, innovative, reliable, fair company and be geared to excellence, which involves meeting both specific company regulations as statutory and accession to the highest ethical standards and professional conduct.

For Ribera Salud, Compliance isn't only comply with applicable laws and internal company regulations, is its way of working, as is the basis for all its activities and tactical decisions for business development. It is part of their culture as an organization and its long-term strategic objectives.

Ribera Salud is aware that each of its acts, every decision it takes, can influence the way the company is perceived by the society it serves and by the other parties with which it interacts and therefore, affect the good image and reputation of the group.

In this sense, it doesn't exist in Ribera Salud commitment to tolerance or behavior that may involve regulatory breaches, corrupt practices or any other form of crime, unethical or bad professional conduct.

Ribera Salud, from its firm commitment to transparency, is willing to cooperate with the competent authorities.





PRINCIPLES

Based on the principles on which the organization is based – integrity, honesty, loyalty, trust, responsibility and solidity – they have been drafted bases of the General Compliance Risk Management Policy Company.

This policy establishes an organizational and risk management model of regulatory breaches adapted to the size and complexity of Ribera Salud Group and its activities, seated on the following pillars:

- The responsibility of the Board of Directors and management team of the company for the implementation of an effective program of Compliance in the organization.
- The implementation of the Compliance function according to the principles of independence, status, absence of conflicts of interest and sufficient resources to ensure their effectiveness.
- The establishment of Compliance committees as internal organs with the mission to supervision, surveillance and control of effective implementation of the Compliance Program at various levels of the organization.
- Promoting a strong culture of Compliance in the Company under the maximum to preserve intact the good reputation of Ribera Salud, comply with the regulation, the ethics and the good professional conduct.
- The adoption of a model of Three Lines of Defense for Compliance risk management in order to preserve an adequate segregation of duties and ensure the greatest possible effectiveness in managing those risk.
- The adoption of the methodology of risk management cycle to implement the Compliance Program based on ISO standards.





BOARD OF DIRECTORS STATEMENTS

This Statement has been approved by the Board of Directors of Ribera Salud S.A in its Meeting held at the Company's Headquarter on December, 14 2015.

Since its incorporation in 1997, Ribera Salud has built up a solid and unharmed reputation founded on our unshakeable Values of Integrity, Honesty, Loyalty, Collaboration, Trust, Excellence and Corporate Strength; well-structured in our Corporate Philosophy based on three main pillars: Responsibility towards the Society we serve, Loyalty towards the Public Administration with whom we collaborate and resolute Support to our Professionals.

Ribera Salud has grown up, keeps growing and will only achieve a steady and sustainable growth for the future within absolute respect to that Culture, by means of a strict adherence of all those who form part of the Company, at all levels, to the highest ethical, personal and professional conduct standards and to the highest level of compliance with both the letter and the spirit of the Law, which shall be understood here in its broadest meaning, this is, not only referred to the Laws approved by the Parliament at International, National, Regional or Local level but also referred to the internal conduct rules approved at any time by the Company's Governance and Control bodies.

As far as Ethics, Professional Conduct and Compliance is concerned there is no room for tolerance or negotiation.

Every professional at Ribera Salud is expected to be aware of that every decision they make, every action they take may affect the perception of our Company by the Society and may impact on the results and our growth for the future.





Based on all the above mentioned, the Board of Directors of Ribera Salud encourages a strong Compliance Culture throughout the Company where:

- Everyone understands and embrace his or her accountability for protecting the Company's good reputation by means of being strictly complaint with the Law and making the right decisions in each case.
- Senior Leadership leads and manage the Company by example, showing at all times unnegotiable ethical and compliance behavior.
- Establishing a stable and permanent Chief Compliance Officer function and a Compliance Committee within the organization.
- Applicable Laws are known and understood. Appropriate Compliance Policies and Procedures are developed and distributed, Compliance Risks are identified, assessed, monitored and treated aiming at achieving operational excellence.
- Open, clear, smooth and transparent communication lines are established for professionals to seek guidance on Compliance topics and report concerns.
- It is ensured that a comprehensive Compliance Education program is developed in order to enable our professionals for early detection of ethical and compliance issues, for thoughtful approach to them and right decision making in each case.
- We are transparent. Appropriate files and records are created and retained in accordance with the legal and regulatory requirements applicable at any time.
- It is developed a gradual and proportionate disciplinary regime to respond to improper/illegal activities, unethical practices, or professional wrongdoings that violate what Ribera Salud expects from its professionals

Thank you for taking your time to read this Policy, getting familiar with it and show your adherence by signing-off the Annex at the end of the document.



ribera salud grupo

COMPLIANCE POLICY & BOARD OF DIRECTORS STATEMENT