Code of Ethics
grupo Ribera Salud

ribera salud grupo

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The Ribera Salud Group: Vision, Mission, Values and Corporate Philosophy

Ribera Salud is the leading healthcare management business group in the sector of healthcare administrative concessions in Spain. Since 1997, Ribera Salud has been the only Spanish company that engages exclusively in developing the public-private partnership (PPP).

Vision

The Ribera Salud group aims to be globally recognised in the health sector for being the healthcare management model that creates the greatest value for citizens, institutions and professionals: innovative, reliable, fair and geared towards excellence, with a firm and unwavering commitment to strict compliance with applicable regulations and adherence to the highest ethical standards of professional conduct in all activities and services that it performs.

Mission

As a healthcare management model that provides value to society, the Ribera Salud group wants to improve the health and wellbeing of people and to transform the healthcare system, contributing to its sustainability while maintaining the excellence and quality of care.

Values

The following Values define us as a Company and represent our inspiration in the way we behave and the decisions we take at any time in our professional activity:

- Integrity,
- Honesty,
- Loyalty,
- Collaboration,
- Excellence,
- Trust and
- Business Strength.

Corporate Philosophy

These Values translate into a social and collaborative Corporate Philosophy which is characterised by a clear and manifest vocation of service to society and involvement and collaboration in the development of strategic projects that benefit all citizens, based on the following pillars:

- Responsibility to the citizen
- Long-term Commitment to the Administration
- A commitment to Professionals

Our actions, our decisions at all times, can influence how the Ribera Salud group is perceived by the society we serve, by third parties with whom we interact and also by our shareholders, and they impact the good image and the reputation that the group has achieved over years of effort and work by all of the professionals who form part of the group, compromising the company's stability and its future sustainable growth.

Consequently, at the Ribera Salud group there is no place for tolerance or negotiation of any kind with regard to behaviour and practices that may involve regulatory breaches, corruption or any other form of crime, unethical practice, malpractice or inadequate professional conduct.

No Code of Ethics can regulate every situation that may arise or take the place of the personal and professional conduct of each individual. Through this Code of Ethics, the Ribera Salud group declares its commitment to compliance with the regulations applicable to its activities and to heed the highest ethical standards. It offers a guideline of principles of conduct that requires adherence by all those with whom the group has dealings through its activity.

The Ribera Salud group recommends that you devote sufficient time to familiarise yourself with the contents of this Code of Ethics and expects you to adhere to and strictly comply with the same at all times.

The Compliance Department is at your disposal for any questions or doubts you may have.

Scope of application

Objective scope

This Code of Ethics regulates:

(i) The rules of conduct to be complied by those who at any time are the administrators, directors and legal representatives.

(ii) The principles of conduct to be observed in the interrelations with patients and persons associated to them and with organizations that may represent them.

(iii) The rules of conduct that must govern relations with both the pharmaceutical industry as well as the healthcare, material and healthcare technology, and other kinds of third-party stakeholders.

(iv) The rules of conduct that must govern relations with Public Administrations.

(v) The basic rules on handling information and the use of electronic resources made available by the company

(vi) The principles of conduct to be observed in relationships between professionals and with our competitors and the environment.

(vii) The application rules of the Code and the competent internal bodies to control its implementation and enforcement.

(viii) The breaches of the Code and possible sanctions.

Subjective scope

This Code applies:

(i) To all professionals bound by an employment relationship of any kind with all companies in which Ribera Salud holds full or majority control, including Directors, Administrators, Managers and temporary staff and trainees.

(ii) To professionals of stakeholders subcontracted for the provision of services of any kind at all companies in which Ribera Salud holds full or majority control.

(iii) To statutory staff (civil servants) at the service of the Public Administrations providing services in any of the centres managed by the Ribera Salud Group. They will be informed of this code of ethics and of its updates through the Commissioner of the Department, as the organic manager of this staff. However, and without prejudice to strict observance of the legal regime that is applicable to them, the principles and rules contained in this code must be adhered to by statutory staff in the exercise of the power of functional organization that the Specifications confer upon the concessionaires of Ribera Salud group.

Everyone subject to application of this Code is required to comply with the rules set out therein.

In the event of any doubt about the scope of application of the Code, please contact the Compliance Department.

Sources of the Code, nature of basic regulation and regulatory prevalence rules

This Code has the nature of a basic internal corporate standard of the Ribera Salud Group.

The Code of Ethics is based on the prevailing regulations applicable to the activities carried out by companies of the Ribera Salud Group, which in any case will be supplementary to all that is not expressly regulated in the Code or in the internal regulations that implement the same.

It also takes into account the self-regulatory codes of good practice, conduct or ethics of the main associations or organisations of companies in the sector with which the Ribera Salud Group usually interacts.

The specific regulation of certain matters in Corporate Policies and their implementing rules shall prevail over the provisions of this Code which, in such cases, shall be a supplementary or complementary standard, and the professional must first comply with the regulations contained in those specific Corporate Policies.

In the event of any conflict or contradiction between the provisions of this Code and any other rules of legal rank or sectoral self-regulation the strictest standard of conduct will take prevalence and must be complied with.

For any doubts or clarifications on how to act in the event of any conflict or contradiction between the regulation of the Code and other regulations, please contact the Compliance Department.

Appendixes and implementing rules of the Code

This Code of Ethics should be read in conjunction with the Code of Conduct, Telematics Code of Conduct and Code of Good Practices in Research and Clinical Trials, which are attached to this Code as inseparable parts of the same. These codes are accessible by Professionals and are available through the Document Manager of the Corporate Intranet.

Some matters covered therein may be subject to further development in specific Corporate Policies, Minimum Standards, Operating Procedures and Instructions.

In such cases, the internal regulation of these matters will be included in this Code and in such developments and should be read and understood in conjunction with each other.

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Part 1: Rules of Conduct applicable to Directors, Administrators, Managers and Representatives

1.1 Scope of application

This part of the Code of Ethics applies at all times to those that are members of the governing bodies and/or management of any of the companies of the Ribera Salud Group included within the scope defined in section 2 of this Code, as well as all those persons with powers to legally represent such entities, whatever the legal form in which such representation occurs.

1.2 Liabilities

Those who exercise functions within the scope of this section of the Code must be aware at all times that they are subject to a strict legal liability regime which, without being exhaustive and with express reference to the prevailing regulations in force at any given time that are applicable to this matter, could be:

• A corporate and civil patrimonial liability arising from the damages that may result to the Company, to its shareholders or third party stakeholders (e.g. creditors) as a result of misuse or abuse of their position, in the event of any fraud, wilful malpractice or negligence, however slight.

• Criminal liability both for the crimes they might commit acting in the name of or on behalf of and in direct or indirect benefit to any companies of the Ribera Salud Group where they perform any of the functions within the scope of application of this section of the Code, either individually or as a member of collegial administration and/or management bodies, as well as any offences that might be committed within the organisation as a result of those who exercise those positions having seriously breached their monitoring, supervision and control duties.

The persons included within the scope of this section must be aware at all times that, under the current penal regulation, because of their positions **they have the legal capacity to transfer criminal liability for their acts or omissions to companies of the Ribera Salud Group**, thus exposing the Company to the risk of being sanctioned, of suffering material financial losses and of causing serious damage to the image and reputation of both Ribera Salud and its shareholders and even third-party stakeholders.

Ribera Salud requires its Directors, Administrators, Managers and Legal Representatives to abide by the highest levels of integrity and professional ethics, not to tolerate any conduct that may involve a violation of prevailing regulations or of the Articles of Association of the Company and, of course, proscribe and pursue any form of criminal behaviour.

Those who at any time hold positions of Administration and/or Management within the Ribera Salud Group, or hold a position as a legal representative thereof, must adapt their behaviour to the provisions of the following sections.

1.3 Duty of Diligence

Those holding Administrative and/or Management positions, as well as those who hold any form of legal representation of the companies of the Ribera Salud Group are required to perform their duties with the diligence of a orderly businessman based on the nature of the position and the duties assigned.

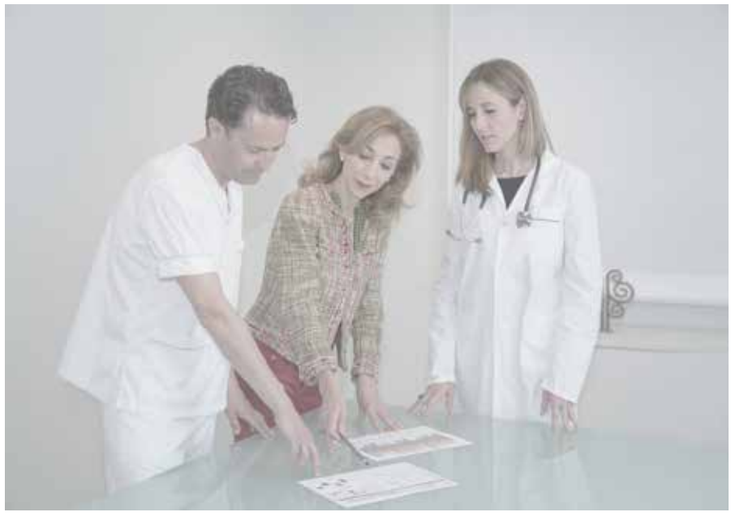
For the purposes of this Code of Ethics, this duty of diligence focuses on:

• Duty of regulatory compliance: this involves, on the one hand, the personal obligation to comply at all times with prevailing legislation and the Company's Articles of Association and, on the other hand, the responsibility inherent to the duty to promote at all levels of the organization a strong culture of ethics and regulatory compliance, taking up the necessary measures to ensure that the organisation has an effective compliance programme that allows proper exercise of its oversight, monitoring and control duties.

• Duty of dedication in accordance with the position: Ribera Salud requires all those holding Administrative and/or Management positions or who hold powers of legal representation to have a level of dedication in accordance with the nature and functions assigned to each position, and that those in charge adopt the appropriate measures for proper management and control of the company at all times.

• Duty of being informed: In the exercise of their duties within the necessities of each position, Ribera Salud expects all those holding Administrative and/or Management positions or who hold legal representation to be aware of all information required prior to the adoption of any decision that could affect the performance of the company's activities, with the timely involvement of all those areas of the organisation or individuals that should inform, advise or assist in decision making. They must strictly comply with the areas regulated in Part IV of this Code of Ethics in handling the information that they receive.

• Duty to investigate: In the exercise of their duties within the necessities of each position, Ribera Salud expects all those holding Administrative and/or Management positions or who hold legal representation to analyse the information they receive with a critical eye and to detect possible



factors that are detrimental or damaging for the company before adopting any decision that could affect the outcome of the company's activities, doing everything appropriate to avoid the damage.

• Duty of supervision, monitoring and control: In the exercise of their duties within the necessities of each position, Ribera Salud expects all those holding Administrative and/or Management positions or who hold legal representation to adopt whatsoever measures required to guarantee sufficient knowledge of the activities of the areas and of the professionals under their charge.

• Duty to protect business judgment: in the context of strategic decisions and business development, which are discretionary on the part of the Company, the duty of diligence of an orderly entrepreneur shall be understood as complied with if those holding Administrative and/or Management positions or holding legal representative powers have strictly complied with the following requirements as part of the necessities of each position:

- They have acted in good faith
- They have no personal interest in the subject matter of decision
- They have adequate information
- There is an appropriate approval process

1.4 Duty of Loyalty

Those holding Administrative and/or Management positions, as well as those who hold any form of legal representation of the companies of the Ribera Salud Group are required to perform their duties with the loyalty of a faithful representative, based on the nature of the position and the duties assigned, acting in good faith and in the best interest of the Ribera Salud Group.

For the purposes of this Code of Ethics, **this duty of Loyalty focuses on the following basic obligations:**

• The general duty not to exercise the functions entrusted for any purpose other than that for which they have been appointed.

• The general duty not to disclose information to which they may have had access as a result of exercising the function or position. This obligation of secrecy will be subject to the rules laid down in Part IV of this Code of Ethics and its regulatory implementation, and shall remain in force even once the link with Ribera Salud has finalised.

• The general duty to preserve their independence, objectivity and freedom of criteria with regard to third-party instructions and associations.

• Duty to avoid conflicts of interest: In the exercise of their duties and within the necessities of each position, Ribera Salud expects all those holding Administrative and/or Management positions or who hold legal representation to avoid situations of conflicts of interest with companies of the Ribera Salud Group. Compliance with this obligation implies:

- Not performing any personal transactions, either directly or indirectly, with companies of the Ribera Salud Group.
- Not using the name of Ribera Salud or the position held to unduly influence private transactions.
- Not making use of the assets of Ribera Salud Group, or of confidential information to which they have had access by virtue of their position, for private purposes.
- Not using for their own benefit any business opportunity of the Ribera Salud Group.
- Not obtaining any benefits or remuneration from third parties related to the exercise of their position within the Ribera Salud Group.
- Not competing with the Ribera Salud Group, either directly or indirectly.
- Not participating in the deliberation or voting on any decision or agreement in which the person holding the position or persons related to said person could be in situation of conflict of interest.
- Identifying potential situations of conflict and seeking advice from the Compliance Department on how to proceed.
- Being aware that the obligation to avoid conflicts of interest also applies when the recipient of the acts or activities is a person related to the party that holds the position.

Part 2: Rules of interaction with patients

2.1 Commitment of the Ribera Salud Group

The Ribera Salud Group is committed to protecting and defending the rights of patients and persons related to them, and to ensuring their safety.

This commitment is reflected in the policies of the organization, mainly in the Policy on the Rights and Duties of the patient, in the QA Policy and the Healthcare Policy, among others; and it is consistent with the benchmark model for quality management chosen by Ribera Salud based on highly demanding standards, whether or not at healthcare level, proposed by the International Joint Commission and which are reflected in the QA Plan.

Given its nature, this Code shall place special emphasis on highlighting the rights of patients and their families.

2.2 Responsibilities of Management and the Departments

Those that hold Managerial or Administrative positions at hospitals and health centres are primarily responsible for the treatment that the centre gives its patients.

These people must exercise their responsibilities loyally, exercising the due diligence to be expected based on their positions and the duties assigned to them. This duty of diligence involves complying with and strictly enforcing compliance throughout the organisation with regard to the obligations under both this Code as well as applicable regulations and the articles of association, and requires an adequate level of dedication to their responsibilities and the ability to adopt the appropriate decisions and measures at all times to ensure efficient management and control of the organisation. In this regard, this encompasses the duty to demand and the right to obtain all information necessary to comply with their obligations.

In particular, with regard to the protection of the rights of patients and their families and their safety, those exercising such leadership positions are expected to:

(i) be aware of and understand the rights of patients and their families,
(ii) be aware of the liabilities that the centre and Ribera Salud Group may face, as defined in applicable regulations, and
(iii) provide clear and specific guidelines to those responsible for the various departments or services to ensure that all staff take responsibility for protecting the safety and rights of patients.

2.3 Bioethics principles

The organization adopt at our health practise, the bioethics principles wrote by Tom L. Beauchamp and James F. Childress:

• Autonomy: It refers to the patients ability to take his or her own decisions without external pressures. The highest expression of this principles is the Informed Consent.
• No maleficence: It means refrain from intentional act that could be harmful or damage to others.
• Beneficence: this is the duty to act in others benefits promoting the legitimate interests and preventing harms from the patients.
• Justice: Giving to each that which is his due, with the aim to mitigate situations of unequality.

Moreover, in accordance to the current regulations, it has been established in each of the health care departments a Bioethics Committee with the objectives, among others, of analysing, advising and facilitating the clinical decision process in situations where ethical conflicts may arise; proposing the internal protocols for those situations where ethical conflicts arise repeatedly or occasionally, collaborating in providing education in bioethics to the health care professionals of the departments and to the committee members and encourage the bioethics investigation within the frame of the healthcare services developed in the centre.

The healthcare professionals confronted with ethical dilemmas in the healthcare practise are requested to address their concerns to the bioethics committee at the first stage.

2. 4 Rights of patients and their families

According to state and regional regulations on the rights and autonomy of the patient and the Patient Charter published by the Consellería de Sanitat i Salut Pública of the Generalitat Valenciana, the patient is acknowledged as having the following rights:

Every patient in the Valencian Community has, inter alia, the following rights:

• Respect for their dignity, without suffering discrimination based on race, sex, economic, social, ideological or age reasons.
• To receive at all times a human, friendly, sympathetic and respectful treatment.
• The nondisclosure of data concerning their health, without anybody, unless they have the patient's permission, being able to access said data except as provided for under prevailing legislation.
• To get healthcare, pharmaceutical and complementary benefits required to promote, preserve, restore their health and/or alleviate suffering, as provided for in prevailing regulations.
• To be made aware of all information obtained about their own health in any healthcare process. However, the patient's wish not to be informed shall be respected. The patient is the sole holder of the right to information.
• To freely decide between the clinical options presented to them by the doctor, after receiving adequate information. Their consent, given through the Informed Consent, is required prior to surgery, invasive diagnostic procedure and whenever procedures that involve relevant risks to their health are carried out.
• To choose the paediatrician and Centre in accordance with the terms and conditions established by the Consellería de Sanitat.
• To get a second opinion within the public health system in situations and under the conditions established through prevailing regulations.
• To access their Medical Records and to get a copy of these records under the conditions set by the Consellería de Sanitat.
• To issue Advance Directives and for these to be accepted by the Health Institution

Furthermore, the organisation wishes to express its commitment, explored even more deeply, if possible, in the development of some of these rights, and incorporating others not specifically recognised in the Patients' Charter, but which are considered relevant for Ribera Salud pursuant to the QA standards proposed by the International Joint Commission.

Attention to functional, linguistic and cultural diversity.

Ribera Salud recognises diversity in all patients that it treats at its primary care and hospital centres. More specifically, it is sensitive towards persons with disabilities and to those with difficulty in communication (language or other difficulties) and to those from other cultures.

All professionals are expected to observe the measures or processes introduced to reduce these barriers and to be fully involved in ensuring the provision of a quality service to the most vulnerable groups of patients against possible physical, language or cultural barriers.

Respect for personal values and spiritual and religious beliefs.

Ribera Salud recognises the diversity of spiritual and religious beliefs and the personal values that each patient may incorporate into the provision of the service,

and encourages its professional to conduct themselves in a proactive way with regard to these so that the patient feels that respect.

For merely illustrative purposes, **the professionals will observe the measures or processes introduced to:**

• Properly identify the values or spiritual or religious beliefs of patients to adapt the provision of services in respect of these.
• Respond to patients' requests, whether complex or routine, related to religious or spiritual support.
• Determine any special dietary needs or habits resulting from their beliefs (such as not eating pork, Ramadan, no blood transfusion in the case of Jehovah's Witnesses), placing these special needs on record in the patient's medical history.
• Ensure that patients at the end of their life receive spiritual or religious assistance according to their beliefs and values, irrespective of the belief or religion the patient professes.

Respect the confidentiality and privacy of patient information.

Ribera Salud recognises that all information collected from patients and/or their families, and everything contained in the medical records is strictly confidential and requires all its professionals to give the utmost respect to the privacy and intimacy of patients and their families and the confidentiality of all information regarding their health, and to rigorously apply the established measures of protection and security of confidential information.

In this regard, professionals should:

• Exercise caution (e.g. safeguarding usernames and passwords to access information systems, keys to cabinets, filing systems, drawers) to prevent unauthorised access to information or clinical documentation of patients, whether on electronic or hard copy format.
• Ensure that access to information or clinical documentation of patients always occurs for justified reasons concerning their healthcare.
• Not access or consult clinical documentation or information of patients for whom they are not involved in their healthcare.
• Only print information or clinical documentation of patients when necessary and collect the printouts immediately, thereby reducing the risk of improper or unauthorised access to that information.
• Avoid commenting on or discussing issues related to patients' healthcare, or details about their clinical documentation or information in public places, both inside and outside the premises of the centre, such as by the door of the patient's room, the nursing checkpoint, corridors, lifts, toilets, cafeteria, car park, etc.

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Protection of patients' property and belongings.

Ribera Salud guarantees patients that their belongings or properties will be kept in a safe place by applying the relevant protocols to the custody of belongings established for each hospital when the patient, due to some kind of procedure, treatment or their physical or mental state, cannot take care of them.

Professionals must inform patients about this responsibility, as well as the ways in which they can exercise their right subject to protocols on the safeguarding of belongings.

Protection of patients and their families from assaults.

Ribera Salud is aware of the possibility that patients and their families could suffer physical assaults, or other types of abuse. To avoid such situations, all patients and their relatives are provided with organised protection against such attacks, especially in the groups of patients at risk, such as children, the disabled or the elderly, through the development and implementation of a process to protect all patients from assaults.

In this regard, professionals should:

• Identify vulnerable groups at risk of further aggression by monitoring all areas where there are patients.
• Apply the measures established through the process of protecting patients from attacks based on the circumstances of the patient and the degree of risk that they face.
• Not engage in conduct that may involve aggression for the patient, whether by collaborating with visitors, other patients or staff of the centre itself.

Rights to information and obtaining prior informed consent.

Ribera Salud recognises the right of all patients to receive information, assisting them and their relatives to participate in the care process through questions and making decisions about the care that patients deem appropriate, as well as facilitating a second opinion for the patient or rejecting diagnostic procedures and treatment. In addition, Ribera Salud recognises the need to document the informed consent prior to surgery, anaesthesia, mild sedation, use of blood or blood products and any other treatment or high-risk procedure in the patient's medical records, regardless of whether consent is obtained from the patient or guardians or legal representatives of the patient whenever this possibility is provided for in law.

In this regard, professionals should:

• Ensure that consent for treatment is clear in its scope and limits, and conducted in a language understood by the patient
• Check that the informed consent has been received for those additional procedures and treatments that require a separate consent form prior to performing such procedures or treatments.

• Check that the information provided to the patient includes: the condition of patients, the proposed treatment, the name of the person providing treatment, the potential benefits and drawbacks, possible alternatives, probability of success, possible problems related to recovery and possible outcomes if the treatment is not performed.
• Support and respect the decisions taken by the patient in the exercise of their right to participate in the care process.
• Not prohibit, prevent or obstruct the patient who is seeking a second opinion, but instead provide this second opinion by giving the patient the information they require about their condition (result of examinations, diagnosis, treatment recommendations, etc.)

Respect patients' advance directives.

Ribera Health recognises the patient's right to give instructions about medical actions that should be taken into account when they are in a situation where they cannot express their will, through the advance directives filed with the pertinent registry put in place by the Consellería de Sanitat, provided that such advance directives are in accordance with the law and good clinical practice.

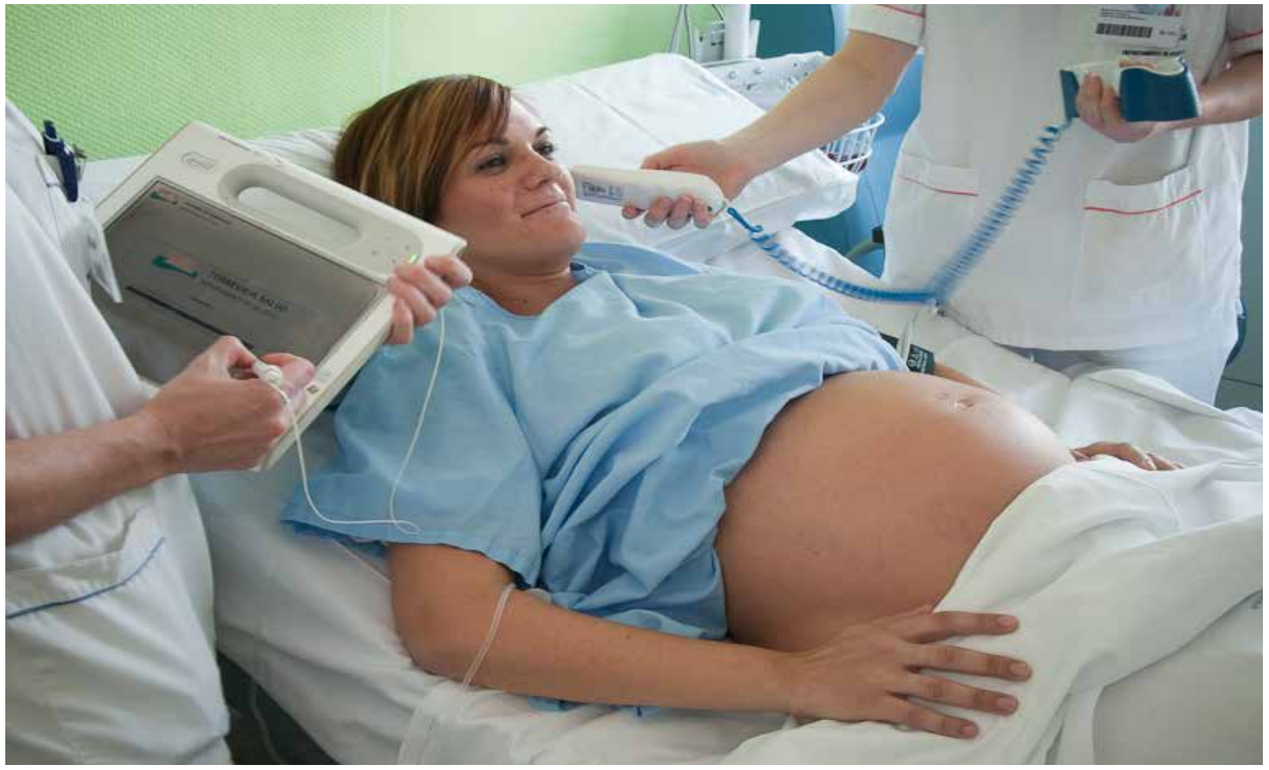
In compliance with this right, **Ribera Salud professionals should consult the document to adapt their activity to what is set out in the advance directives.** Specifically, they should consult it whenever the patient is unable to express their will, due to the patient's legally recognised right to modify, replace or revoke their advance directive.

Part 3: Rules of interaction with stakeholders

3.1 Principles of Independence, Prudence and Transparency

In their daily performance, professionals may have dealings, apart from with patients and their environment, with other Stakeholders, such as pharmaceutical companies, manufacturers or suppliers of materials, products or health technology, educational institutions and also with the Public Administration.

Professionals should be aware that occasionally, in the context of these relationships, situations may arise where the integrity, honesty and ethics of both the professional as well as the Ribera Salud group may be called into question, even if this is only in appearance, and that the professional conduct and decisions taken in light of the situations can impact the perception that both society and other stakeholders with whom the Ribera Salud group has dealings have of the organisation and could affect its good image and reputation.



In their dealings with representatives of Stakeholders, **professionals must act independently at all times,** being aware that these relationships can have an impact on patient care and the development of clinical research.

With regard to their dealings with stakeholders, **the professionals are expected to act with prudence,** applying common sense and **not engaging in conduct that may involve, or be perceived as, corrupt practices** and conflicts of interest and they must not carry out secondary activities that clash with the services they provide as a professional.

Professionals should always act with full transparency before the organisation, seeking advice either from their superiors or the Compliance Department, and wherever necessary getting preliminary authorisation through the internal bodies for the purpose of preventing and appropriately managing those situations that may pose a risk for both the professional and the Ribera Salud group.

3.2 Gifts

For the purposes of this Code, Gifts are understood as small presents offered or received without consideration as a symbol of esteem, affection or a good relationship in business activities wherever reasonable and permitted by applicable law.

It is expected that whenever professionals of Ribera Salud receive gifts that will act with full transparency and apply common sense to determine whether the gift is intended to or has the ability to influence the decision-making of the recipient, as well as the perception or expectations that acceptance of the gift could generate for the person offering the gift.

Professionals of the Ribera Salud group shall comply with the following standards:

- Amounts of money in cash or through any other instrument or means of payment, irrespective of the amount, cannot be offered or accepted.
- In relations with Stakeholders, including but not limited to the Pharmaceutical Industry, suppliers of products, equipment or medical technology and entities controlled by them, it is forbidden to directly or indirectly accept or request the handover of any kind of incentive, bonus or gift, with the particularities regulated in the following section regarding educational or informative materials and items of medical utility.
- It is forbidden to offer, promise, give, hand over, solicit, receive or accept, directly or through an intermediary, any gift of any kind in relations with people serving the local, regional, national or foreign Public Administrations.
- In general, the Ribera Salud group is sensitive to social uses and, in this regard, those gifts of small value that may be offered by patients and their families may be accepted, once the patient's healthcare has concluded, as a token of thanks or esteem for the professionals responsible for the care provided to the patient.

In the event that a gift cannot be accepted according to the above rules, the professional must reject it. **Should it prove impossible to decline the offer, the professional should immediately report this fact to the organisation and seek the advice of the Compliance Department on how to proceed in such cases.**

3.3 Training and informative materials and items of medical utility

In relations with Stakeholders, including but not limited to the Pharmaceutical Industry, suppliers of products, equipment or medical technology and entities controlled by them, professionals may occasionally encounter situations in which they are offered training or informative materials and items of medical utility.

For the purposes of this Code of Ethics, the following shall be understood:

- Training and informative materials: those materials that are intended to train or inform a health professional about the use of medicines, techniques or procedures to be used in their activity.
- Items of medical utility: articles aimed at training of Health Professionals and patients' healthcare.

It is expected that whenever professionals of Ribera Salud receive offers of training or informative materials or items of medical utility they will act with full transparency and apply common sense to determine whether what is being offered is intended to or has the ability to influence the decision-making of the recipient, as well as the perception or expectations that acceptance of the gift could generate for the person offering it.

Professionals can, if necessary, **accept training and informative materials and items of medical utility** offered by Stakeholders for a legitimate purpose, **provided that all the following conditions are met:**

- They are materials of little value, not exceeding a market price 60 Euros.
- They are materials directly related to the practice of medicine or pharmacy.
- They are materials that directly benefit the care or attention of patients.
- They do not alter the usual practice of their recipient.
- They do not constitute an inducement to recommend, purchase, use, supply, sell or administer medicines, products or services.

In the event that the materials or items offered by the Stakeholder cannot be accepted according to the above rules, the professionals must decline.

Should it prove impossible to decline the offer, the professional should immediately report this fact to the organisation and seek the advice of the Compliance Department on how to proceed in such cases.

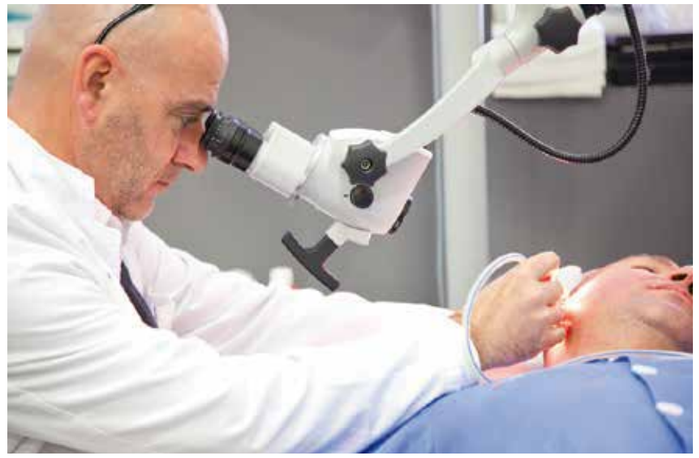
3.4 Scientific and professional meetings

For the purposes of this Code of Ethics, scientific and professional meetings are all kinds of events that are organised or sponsored by a Stakeholder. These include, but are not limited to, pharmaceutical companies or suppliers of materials, products or medical technology, or under their control, those attended by health professionals in the exercise of their profession and which could affect or condition the activities of prescribing, buying, distributing, dispensing or administering a medicine, material or a medical device.

The specific regulation of certain matters in Corporate Policies and their implementing rules shall prevail over the provisions of this Code which, in such cases, shall be a supplementary or complementary standard, and the professional must first comply with the regulations contained in those specific Corporate Policies.

In any case, **the participation of professionals in any scientific or professional meeting to which they are invited,** either as speaker, moderator, attendee or any other form of participation at the meeting, **shall be subject to prior notice from the professional to the Teaching Committee** in the case of resident professionals or competent internal body in the case of other healthcare professionals **and the express approval by these internal bodies once all of the appropriate procedures** have been followed based on the criteria defined by this Committee or Body and which must at least take into account the following factors:

• In his communication to the Teaching Committee or competent internal body requesting approval to attend a meeting, the professional must provide a personalised invitation letter from the organiser or sponsor of the meeting.
• The event to which the invitation refers is exclusively a meeting of a scientific-professional nature, and is organised, sponsored or subsidised by recognised bodies and certified as being of scientific interest.
• The medical or scientific aspects of the meeting should in any case be the main objective of the event, and the invitation received from the Stakeholder must not include the provision of any sponsorship or subsidy to the professional for any kind of recreational activity either before, during, or after the event.
• The venue for the meeting should not be a place predominantly linked to tourism, leisure, recreational or sporting activities.
• If the event to which the invitation refers is held outside Spanish territory, it must be justified logistically by the Stakeholder making the invitation to the professional.
• Hospitality expenses to be included in the invitation to the event must be reasonable. Under no circumstances can the hospitality expenses be extended to persons other than the healthcare professional, such as relatives or travelling companions.



• Under no circumstances can the invitation received by the professional be conditioned or subordinate, whether implicitly or explicitly, to any obligation related to the purchase, or past or future use of any product or service, or the recommendation or prescription of certain medicines.
• No money can be offered simply to compensate the time spent by health professionals on attending the event.

Fees and Reimbursement of the Professional's Expenses

The professional shall be entitled to accept the payment of fees and reimbursement of reasonable personal expenses by the party that sent the invitation, if the healthcare professional takes part in the scientific or professional meeting as moderator or speaker.

In no case may the professional accept, directly or indirectly, any money simply to compensate them for the time spent attending the meeting, outside of reasonable hospitality costs already set out in the invitation to the event.

3.5 Samples of medicines and medical devices

For the purposes of this Code, a sample of medicines is understood as any substance or combination of substances presented as having properties for treating or preventing disease in humans or that can be used in humans or administered to them in order to restore, correct or modify physiological conditions by exerting a pharmacological, immunological or metabolic action, or making a medical diagnosis.

The acceptance of samples of medicines and medical devices shall only take place in agreement with the internal procedures set up by the organization at any time. **In any case, no healthcare professional out of the pharmacy are permitted to accept or received samples of medicines.**

In all cases, **the acceptance of such samples must comply as a minimum with the following requirements:**

• They are free of charge.
• They do not exceed the amounts established by national legislation for free samples.
• The sample of the medicine is not greater than the smallest format of the medicines available in the domestic market.
• The medicine samples do not contain psychotropic substances or narcotics.
• The medicine is not authorised for longer than two years.

3.6 Participation in Studies

The Ribera Salud Group professionals may be invited to participate in the following research studies:

Clinical medicine trials: all research conducted on humans to determine or confirm the clinical or pharmacological effects and/or detect adverse reactions, and/or to study the absorption, distribution, metabolism and excretion of one or more medicines under research. In the event that the clinical trial is conducted with authorised medicines, they will be considered as clinical trials with a low level of intervention in order to determine their safety and/or efficacy and in which the following conditions are met:

- The trial subject shall be assigned a specific therapeutic strategy beforehand, which is not part of routine clinical practice.
- The decision to prescribe the medicines under research is taken together with the decision to include the subject in the clinical study.
- Procedures for diagnosis or monitoring of trial subjects are applied that go beyond standard clinical practice.

Post-authorization studies with medicines: any observational clinical or epidemiological study conducted during the marketing of a medicine under the conditions authorised in its technical sheet, or under normal conditions of use, in which the medicine of interest is the exposure factor fundamentally investigated.

Clinical trials with medical devices: all research conducted on humans to verify the safety and/or performance of medical devices not bearing the CE mark.

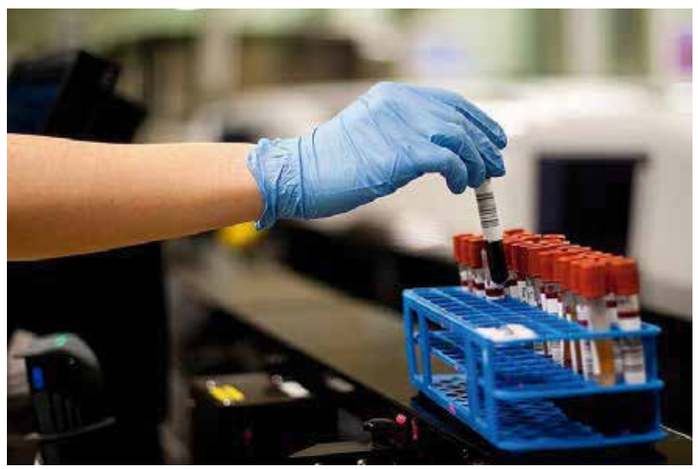
Post-authorisation studies with medical devices: any observational post-marketing study of medical devices that have CE marking.

Studies with invasive procedures involving interventions on humans or the use of biological samples of human origin: any intervention undertaken for research purposes that involves a physical or mental risk for the affected subject.

Other observational studies: for the purposes of this Code, this section will include the remaining studies that can be conducted by a healthcare professional of the Ribera Salud group. In particular this includes market research, understood as systematic capture and interpretation of information on persons or organisations using statistical and analytical and technical methods of social sciences, applied to obtain new insights or support decision-making methods.

Prior to taking part in research studies, professionals of the Ribera Salud group are expected to comply with the following rules of conduct:

• That they notify the purpose of the study to the organisation prior to commencement thereof and with full transparency, and submit it for approval by the Research Commission or Clinical Research Ethics Committee (CEIC), as appropriate.
• That they check there is no conflict of interest between the usual activity of the healthcare professional and that which would derive from their participation in the study. If there is any suspicion of the existence of a possible conflict of interest, the professional is obliged to report that fact to the Research Commission or the Clinical Research Ethics Committee (CEIC). If the identified conflict is manageable, then the professional will be required to take the preventive measures necessary to properly manage the conflict during the time that it lasts because of his involvement as a researcher in the study. If the conflict is not manageable, the professional must report this fact transparently to the study sponsor and the Research Committee or Clinical Research Ethics Committee (CEIC) to allow them to decide as appropriate. If in doubt about whether or not a particular situation involves a potential conflict of interest and how to manage it, both the professional and the Research Commission have the Compliance Department at their disposal.
• That they provide justification that the study for which they have been proposed relates to their activity as a healthcare professional.
• The remuneration for participation in such studies will be in accordance with market prices and a prior written contract that clearly states the terms and conditions of taking part in the study.



• In the event that hospitality is offered, this must be reasonable and appropriate to the circumstances of the professional and the study to be conducted.

In addition to the above, in the case of market research studies, **the following requirements must also be met:**

• It will be carried out by aggregating data, and the information collected will be anonymous.
• The results and data obtained cannot be published or used in promotional materials.
• The study does not represent an inducement to recommend, purchase, use, supply, sell or administer medicines.

3.7 Grants, donations and subsidies

There may be situations where the Stakeholders, including but not limited to pharmaceutical companies, entities providing medical materials and devices, depending on their own interests and capabilities, offer patronage, donations or subsidies, in cash or in kind. Under all circumstances these must be for the purpose of training healthcare professionals, clinical research support and facilitating social, health or humanitarian assistance.

Professionals are not allowed to receive or accept any offer that may be made to them individually, and these must be subject to the provisions of sections II.4 and II.6 regarding attendance at scientific and professional meetings, and participation in studies, respectively.

Should the professional find himself in the situation that contravenes the provisions set out in this section, he must decline the offer and immediately report this fact to the organisation and seek the advice of the Compliance Department on how to proceed in such cases.

3.8 Secondary activities, Advisory or Consultancy services

For the purposes of this Code of Ethics, secondary activities shall be considered to be both professional activities, either for themselves or for others, undertaken by the professional of the Ribera Salud group outside their time devoted to the company, as well as those business interests outside Ribera Salud that the professionals may have.

The nonexclusivity in the employment relationship between the professional and the Ribera Salud group allows the professional to perform secondary activities. However, these secondary activities cannot be performed whenever they lead to a conflict of interest between the activities performed by the professional.

The following are considered to be advisory or consultancy services provided by health professionals, individually or in groups: presentations at meetings as speakers or moderators, training, expert meetings, etc. involving the payment of remuneration and/or travel costs and expenses.

These services, which must be formalised through an individual agreement between the healthcare professionals and the entities requiring advisory or consultancy services, **must meet the following conditions for health professionals to accept the offer to take part:**

• Be for the purpose of collaborating with healthcare, research, teaching or organization of professional or scientific events.
• The type of services and the number of professionals recruited to perform the service must be clearly identified.
• The selection of professionals has been carried out considering that the professional is skilled in the art.
• The study does not represent an inducement to recommend, prescribe, purchase, supply, sell or administer medicines.
• The remuneration of the participating professional is in line with market criteria and is consistent with the time spent, the work done and the responsibilities assumed.

It is expected that whenever professionals of Ribera Salud receive invitations to provide advisory or consultancy services, they will act with full transparency and apply common sense in the acceptance thereof. For cases in which such invitations cannot be accepted, the professional must decline it through the procedure specified in the Prevention of Bribery Policy.

3.9 Due Diligence in relations with Stakeholders and veto power

In those areas or departments of the organisation in which business relations with Stakeholders are established, whether these are companies from the pharmaceutical or health sector or any other sector, understood for these purposes as the natural or legal persons who, by virtue of a business relationship of any kind, can offer their services or products to Ribera Salud, or acting on behalf of or as an intermediary, representative or agent of Ribera Salud, **the professionals must conduct themselves in such a way as to ensure that, prior to the establishment of any business relationship, the Ribera Salud group:**

• Has carried out a rigorous analysis of the risks of both the proposed relationship as well as the third party with whom the relationship is to be established.
• Based on this preliminary risk analysis, proportional measures of due diligence have been applied and documented that enable the Ribera Salud group to be sufficiently aware of the identity and legality of the third party's activities.
• It has informed the third party about the due diligence procedures applicable by Ribera Salud, and the information necessary on the due diligence procedures carried out has been obtained from the third parties.
• These relations are formalised through a contract that must at least contain the will of the parties, respect for the obligations arising from the regulations applicable to the activity for which the relationship is struck up, and with the anti-bribery and anti-corruption clauses.

In the event of any doubt about the due diligence measures applicable to a Stakeholder, or about the preliminary risk analysis, the professional should seek advice from the Compliance Department.

The professionals must be aware that, in any case, the Ribera Salud group will have veto power over any business relationship with Stakeholders, particularly if there has been any reluctance by the third party that have prevented or delayed the procedure of applying the due diligence measures necessary, or that the information provided has not been sufficient to successfully complete the level of knowledge of the Stakeholder required by the Ribera Salud group in order to establish the business relationship.

3.10 Relations with the Public Administration

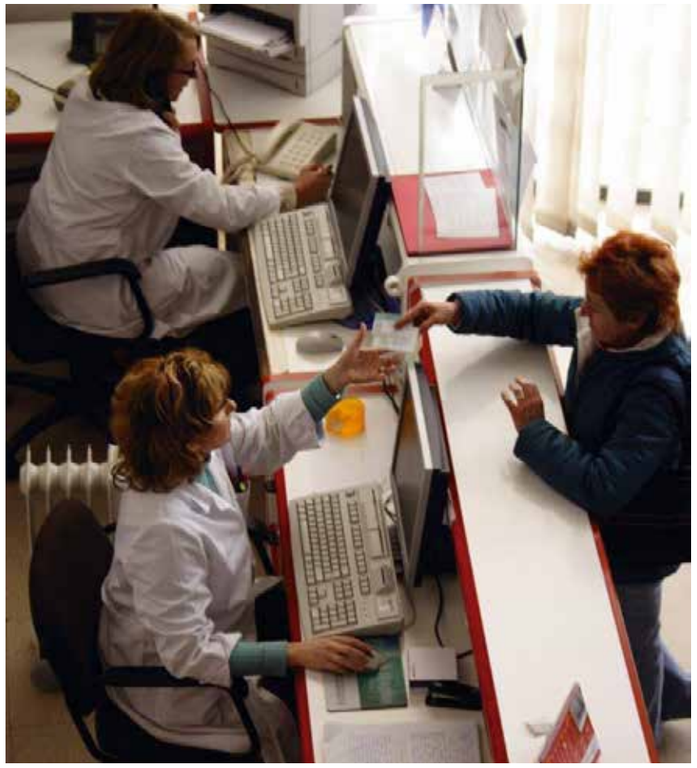
Corruption in all its forms and bribery represent unacceptable conduct that Ribera Salud group does not tolerate under any circumstances.

No professional of the Ribera Salud group is authorised to offer, promise or give any undue benefit or advantage, whether pecuniary or otherwise, corrupt or attempt to corrupt, either themselves or through an intermediary, an authority or civil servant, whether national or foreign, in their own or third-party benefit, to act or refrain from acting in relation to the exercise of public functions in order to maintain a contract, business, or any other competitive advantage in carrying out economic activities, whether at local, regional, national or even international level.

Similarly, no professional of the Ribera Salud group should agree to any requests regarding the conduct described in the preceding paragraph, from a civil servant or public authority.

In the event that a professional of the Ribera Salud group faces a situation that could induce or force them to perform any corrupt practice such as those defined, they should immediately contact and seek advice from the Compliance Department.

Part 4: Rules on handling information



4.1 Types of Information

To enable professionals to perform their job properly, Ribera Salud provides access to information of different kinds:

Public Information: any publicly available information and knowledge, for example: publications, journals, newspapers, books, reference manuals, informational or advertising brochures.

Confidential Information: all that non-public information that refers to the Company, patients or third parties or that is protected, either by a legal provision or through contractual nondisclosure clauses and whose improper disclosure or unauthorised access could damage the image and reputation of the Company, cause material financial losses and/or sanctions of any kind. By way of an example and for merely illustrative purposes, the following are confidential:

- The personal data of employees, patients, representatives of stakeholders, as well as the relatives or related parties to which Ribera Salud may have access in the exercise of its activities and services.
- All information contained in the medical records of patients.
- All information that relates to the strategic planning and business development of the Company.
- All financial information of the Company that has not yet been made public or that has been prepared without the intention of being published.
- All legal documents: contracts, litigation, administrative proceedings, claims.
- Any information that is protected by copyright or industrial or intellectual property of the Company.

Classified Information: confidential information that is only intended for specific recipients by virtue of their position or duties on a need to know basis.

Inside Information: for the purposes of this Code of Ethics, inside information shall be understood as all that information of a precise nature that refers to one or more securities or financial instruments falling within the scope of Law 24/1988 of 28 July, on the Securities Market, or to one or more issuers of such securities or financial instruments, which has not been made public and which, were it to be made public, could significantly influence or would have significantly influenced their price.

As a general principle of conduct, **the professionals of Ribera Salud are expected to be able to identify the kind of information they handle at all times and comply strictly with the rules of keeping and reporting information depending on the type in question**, as set out in the following sections.

4.2 Duties of safeguarding and control of Confidential, Classified and Inside Information

Safeguard duties

All professionals with access to Confidential, Classified and/or Inside information should apply the utmost diligence and care in protecting this information to prevent unauthorised access by third parties to such information and the use and/or improper dissemination of the same.

In this respect, and without prejudice to the development of this matter in a specific Corporate Policy and operational procedures that are introduced, **all Professionals are at least expected to observe the following basic rules of safeguarding:**

- All Confidential, Classified or Inside information must be kept in locked cabinets or locked drawers at the end of the working day and in the event of prolonged absence of the possessor, for example, to attend meetings or take a lunch break.
- In the event that the information is stored electronically, the possessor-user must ensure that his session is blocked whenever he is absent from his workstation in cases such as those exemplified in the preceding paragraph, and completely shut down the computer at the end of the working day.
- Similarly, as a general measure of information security, Professionals should in no case share with others their usernames and passwords used to access computer systems of any kind in which information may be classified as Confidential, Classified or Inside.
- Professionals who are in possession of Confidential, Classified or Inside Information shall refrain from and take precautions to avoid talking about this information in public or transited places where it may be viewed or heard by others. In particular, they will avoid discussions with a physical presence or by phone in areas where there is a risk of eavesdropping by other Professionals or third parties who should not have any knowledge of that information, for example: in the coffee room, office, toilets, lifts, nursing station, waiting rooms, restaurant, taxi, trains, planes, or the like.

Control duties

In many cases, there may be the need to share Confidential, Classified and/or even Inside information with other Professionals of the Company or with third parties. When communicating and sharing these kinds of information, and without prejudice to its development in a specific Corporate Policy, **Professionals should at least know and apply the following control measures:**

- They must ensure that the third party with whom they intend to share the information has a real need to know, either for the proper performance of their duties or to enable fulfilment of an obligation or service contracted with the Company, and inform them clearly of the nature of the information and of their duties to safeguard and control such information.
- Confidential, Classified or Inside Information must be clearly and visibly identified as such with a distinctive sign, such as a seal or statement indicating its nature: “Confidential”.
- Maintain proper custody and filing for the preservation of all Confidential, Classified and/or Inside information under the terms required through regulations applicable to the information in question or nondisclosure agreements signed by the Company.
- Should the Professional detect or become aware through any means of a leak or unauthorised access by another Professional or third party to Confidential, Classified and/or Inside information, he must immediately report this to the Compliance Department.

4.3 Principles of conduct regarding the use of computer systems, email and the Internet

Ribera Salud provides its professional with computer systems, email and Internet access in order to facilitate and support the activity performed by each professional. Ownership of the computers made available to the professional belongs to the company. The professional recognises that the mere use of such equipment does not confer any right or expectation of rights over the same.

It is expected that these tools are used by professionals with responsibility, transparency and common sense, and specifically subject to the following principles of conduct:

- The tools will be used exclusively for professional use.
- Adequate precautions will be taken to avoid any risk of loss, destruction, dissemination, use or unauthorised modification of files and documents.
- The installation of software should always be performed by the Systems Department.
- The professionals shall not make a copy of the software or files provided.
- Avoid opening any file from unknown sources, downloading files from dubious sources and connecting any devices to the workplace network that have not been authorised by the Systems Department, in order to avoid the risk of spreading computer viruses.
- No usernames or passwords are shared and these are to be kept by the user so that third parties cannot access them.
- The professional must block his username whenever he is absent, even temporarily, from where the hardware is located with which to access corporate computer systems, thus preventing unauthorised access to information.
- At the end of the working day, the professional must log out of his username and shut down the hardware with which he has accessed the computer systems. Similarly, to prevent unauthorised access he should proceed to save or store under lock and key the documents available on hard copy and which contain corporate or healthcare data in places authorised by the organisation, such as lockable cabinets or drawers.

This section should be read together with the complete regulations contained in the Code of Online Conduct annexed to this Code of Ethics.

Part 5: Rules of interaction between professionals

5.1 Respect, Equality and non-discrimination

At Ribera Salud, equality and non-discrimination based on gender, ethnicity, sexual orientation, religious beliefs or other circumstances that are part of the idiosyncrasies of persons, values that are inherent to its own formation and modus operandi in this regard, considering these values to be fundamental pillars above any other. To this end the company promotes an active Corporate Equality Policy among all professionals.

Professionals, in their interaction with peers, are expected to assume these values as their own.

5.2 Prohibition of any form of violence

Violent behaviour or any form of violence among professionals work at Ribera Salud is unacceptable.

Ribera Salud professionals are not expected to engage in any kind of violent behaviour, such as assaults, moral harassment, sexual harassment or any others that damage the physical or mental integrity or health of the person affected by the attack.

Professionals must be aware that, in the event of detecting behaviour that infringes these values and enforceable basic rules of coexistence, the Ribera Salud group will exercise all its disciplinary powers against the offender, subject to the regulations in force. If appropriate, it shall report the behaviour detected to the competent authorities and actively cooperate in clarifying the facts and defining any responsibilities of any kind that may result.

Part 6: Rules of interaction with the environment

6.1 The Environment

A commitment to the environment is a key element of corporate social responsibility for the organisation. Caring for the environment or polluting it to the least possible extent is, for a health organisation, an important value given that the health of its population will depend on the extent to which the environment where they live is polluted.

Its professionals are expected to heed and respect the following rules on environmental care established by the Corporation to this end:

- Actively contribute to environmental sustainability, reducing the environmental impact and use of energy resources that can be generated at the Health Departments of Ribera Salud Group.
- Support the acquisition of energy efficient products and services and design to improve energy performance.
- Comply with all applicable legal requirements in environmental matters and others established by the organization.
- Ongoing improvement of its services and processes, pollution prevention and energy efficiency.
- Meet the proposed certification targets.
- Meet the annual targets for reducing consumption of natural resources, tonnes of CO2 and waste generation.

6.2 Competition

As a consequence of its daily activity Ribera Salud and its professionals interact with various social agents such as the Public Administration or other legal entities such as Associations or Companies. In this regard, ours is an organisation committed to the defence of competition and respect for patients and users of the healthcare service.

To the extent applicable to the activities they undertake, professionals of the Ribera Salud group are expected to respect the following principles:

- Not to engage in collusive behaviour, understood as agreements, decisions or collective recommendations or concerted practices which are for the purpose of producing or being able to produce the effect of preventing, restricting or distorting competition in all or part of the domestic market.
- Not to engage in conduct involving abuse of a dominant position, understood as abuse by one or more companies of their dominant position in all or part of the domestic market.
- Not to engage in conduct for the purpose of distorting free competition through unfair acts.
- Not to engage in exchanges of information with other companies aimed at fixing prices or quantities.
- To maintain the appropriate professional secrecy concerning any information, data, reports or records to which they have had access as a result of the performance of their duties and which are considered, under applicable law, as sensitive, inside or secret information.
- To cooperate with the competent authorities in exercising their powers of supervision, monitoring and control in the defence of competition.

Part 7: Control of compliance with the code of ethics

7.1 Competent internal body

The Ribera Salud group has designated the Compliance Committee as the competent internal body for monitoring compliance with this Code of Ethics.

This Committee will act in accordance with the principles described in this Code of Ethics and with the structure, foundation, composition, performance, methodology and objectives that have been attributed through approval of the General Policy and Strategy of Management of Compliance Risks made available to all professionals on the corporate intranet.

In the event of any doubts about the powers of the body responsible for monitoring compliance with the Code of Ethics, the Compliance Department is at your disposal to resolve these.

Part 8: Channel for reporting breaches

The channel for reporting breaches is a strictly confidential and direct way to communicate with the Chief Compliance Officer. This method of communication is specifically developed in section 7.4, on reporting irregularities, of the General Policy and Strategy of Management of Compliance Risks made available to all professionals on the corporate intranet.

Professionals who have knowledge or grounds for suspecting irregularities in compliance with the rules set out in this Code are expected to report these to the company through any of the channels enabled to this end, and they may use this channel when the circumstances, in their professional judgment, so warrant.

Part 9: Disciplinary system

At Ribera Salud, there is zero tolerance towards unethical conduct, illegal practices, inadequate professional conduct or breaches of applicable regulations.

Therefore, any unethical or illegal practices, professional misconduct and lack of compliance with the applicable Corporate regulations, either alleged or detected, will be investigated and the findings will be documented and reported as regulated in the General Policy and Strategy of Management of Compliance Risks.

Based on the outcome of the investigation, Ribera Salud may be entitled to take disciplinary action in accordance with applicable legislation. The disciplinary measures taken will be made subject to the principles of a hearing, contradiction, proportionality and appropriateness, for the purpose of preventing the risk of recurrence or persistence in the criminal offence.

As regards statutory staff, to whom this Code of Ethics also applies, the power of Ribera Salud concerning possible breaches of the same extend to the disclosure of the breach of the Code to the Commissioners of the competent Public Administration.

Part 10: Review and update of the code

The review and update of the Code of Ethics will take place with the frequency, focus and casuistry set out under the General Policy and Strategy of Management of Compliance Risks.

CONTACT

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