Laboratorios

LABORATORIOS ENTEMA

Code of Ethics

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CONTENTS

Index

01 Introduction 02

02 Our values 02

03 Code of ethics and conduct 03

04 Compliance with the code of ethics and conduct 09

05 Annexes 11

01 Introduction

1.1 Purpose

This Code, which is inspired by the Institutional, Business and Organisational Principles of LABORATORIOS ENTEMA, hereinafter "ENTEMA", aims to set out the corporate values and the basic principles that must guide the conduct of ENTEMA and of the people who form part of it.

We must be aware that, in the course of our professional work, some of our activities may affect the company's image and reputation. For this reason, how we do things is just as important as what we do.

1.2 Scope of application

Whatever their position or level, the Code applies to all ENTEMA employees.

02 Our values

ENTEMA makes the following principles, among others, part of its strategy, its culture and its everyday actions:

2.1

Independence from any person, entity, group or power of any kind.

2.2

Ethical, transparent and socially committed conduct, in recognition of the role and responsibility of private entities in the proper development and progress of Society, and guaranteeing respect for the legitimate rights of all natural or legal persons with whom it interacts, and for those of Society in general.

2.3

Management based on strictly professional and technical criteria, avoiding conflicts of interest.

03 Code of ethics and conduct

The corporate values described above are the reference that must inspire the conduct of all ENTEMA employees, which must be based on mutual respect among all the people with whom they interact, commitment to their work and to the company, the responsibility to do their work as well as possible, solidarity and cooperation with colleagues and society, integrity and respect for the law; so that our working environment is one of trust that enables personal and professional development, and is free from offence, exploitation of any kind, intimidation, harassment and discrimination.

Naturally, this Code cannot cover every situation that may arise in the course of work, but it does establish minimum guidelines to guide employees in their professional conduct.

Compliance with the content of this Code is mandatory for all persons who provide their working services to ENTEMA.

3.1 · RELATIONS WITH AND AMONG EMPLOYEES

3.1.1 Labour Rights

ENTEMA is committed to defending, respecting and protecting basic labour rights, as well as the human rights and public freedoms recognised in the Universal Declaration of Human Rights.

To this end, ENTEMA does not employ, either directly or indirectly, child labour or persons performing forced labour, and guarantees its employees' freedom of association, opinion and expression.

Consequently, ENTEMA's respect for labour rights must be reflected in all the professional actions of its employees.

3.1.2 Commitment, Efficiency and Professional Development

ENTEMA fosters a working environment in which employees share in the company's strategic objectives and can develop personally and professionally.

CONSEQUENTLY

- To achieve the commitment and involvement of all employees in the project, they must be informed of and know the general objectives of the company and, where applicable, the specific objectives that concern them.
- All employees must act with dedication and efficiently, making rational use of their working time, which will contribute to their professional and personal growth.
- All employees must take personal responsibility for their professional development, increasing their skills and continuously updating their knowledge, which they must share with their colleagues.

3.1.3 Respect for people

ENTEMA considers that respect for others must be a basic element of its employees' conduct. It therefore rejects any form of harassment at work, as well as any violent or offensive behaviour towards people's rights and dignity, since such situations poison the working environment and have negative effects on the health, well-being, confidence, dignity and performance of those who suffer them.

CONSEQUENTLY

- All employees have the obligation and the responsibility to treat their colleagues with respect.

3.1.4 Equal opportunities and non-discrimination

ENTEMA undertakes to provide a suitable working environment in which there is no discrimination of any kind on the grounds of sex, race, ideology, religion, sexual orientation, age, nationality, disability or any other personal, physical or social condition, and in which diversity is respected and valued.

CONSEQUENTLY

- All employees must, through their conduct, foster working environments in which the equality policies established at ENTEMA are respected.
- All employees with professional responsibility over other people must be objective in their selection and promotion, as well as in setting their pay conditions, in their training and in their evaluation, and all these actions must be carried out within a framework free from any kind of discrimination, based exclusively on individual performance, professional merit and the person's performance.

3.1.5 Work-life balance

ENTEMA considers that the all-round development of its employees is positive both for them and for the company, and it therefore promotes measures aimed at achieving a balance between its employees' family/personal and professional responsibilities.

Consequently, all employees must respect the private lives of others and make it easier for them to benefit from the work-life balance measures established in the company.

3.1.6 Occupational Risk Prevention

ENTEMA's Occupational Risk Prevention Policy aims to provide safe and healthy working environments, thereby guaranteeing people's right to the protection of their health and integrity.

CONSEQUENTLY

- All ENTEMA employees must know and strictly comply with the health and safety rules established in the company.
- All employees have the right and the duty to report, through the channels established for this purpose, any situation in which the health and safety of workers is being endangered.

3.1.7 Protection and proper use of company assets

ENTEMA provides its employees with the facilities, means and tools necessary to perform their professional duties, and these must therefore not be used for other purposes.

CONSEQUENTLY

- All employees must use the work means and tools that the company makes available to them, such as the telephone, computer, e-mail, Internet access or other materials and equipment, exclusively for carrying out the work activities assigned to each of them, and these must not be used for personal or other purposes.
- All employees must make proper use of ENTEMA's assets and protect them from damage, loss or theft.
- Except with prior and express authorisation, the use of ENTEMA's facilities and/or vehicles to carry out activities, whether paid or not, that are not directly or indirectly related to ENTEMA's business or to its employees' work will not be permitted.

3.1.8 Confidentiality of information and Personal data protection

ENTEMA has an Information Security Policy whose objective is to preserve the confidentiality, integrity and availability of information. ENTEMA's information is the property of the company and is essential to the development and success of its business.

CONSEQUENTLY

- Information security is a responsibility of all ENTEMA employees, who must protect the company's information and carry out their activities by adopting and applying the established security rules and procedures.
- No employee may use the information to which they have access by reason of their work for purposes other than those established by law or by contract.
- All ENTEMA information relating to customers, shareholders, employees, suppliers, strategic plans, and financial, commercial, statistical, legal or similar information must be considered confidential and treated as such.
- Personal data must be processed in a way that guarantees people's right to privacy and in accordance with personal data protection legislation.
- All ENTEMA employees must undertake the commitment to confidentiality by signing the confidentiality clause established for this purpose.

3.2 · RELATIONS WITH THIRD PARTIES

3.2.1 Company brand and image

ENTEMA considers its brand, its image and its corporate reputation to be among its most important assets.

CONSEQUENTLY

- All employees must ensure that their conduct does not damage ENTEMA's image and reputation.
- No employee may use the ENTEMA name and brand for purposes other than those permitted by the company.

3.2.2 Quality of service, customer care and fair competition

ENTEMA is constantly concerned with improving its offering and the quality of its services, as well as with establishing relationships of trust and mutual respect with its customers.

Out of respect for its customers, ENTEMA states its commitment to compete in the market actively but fairly, respecting the free market and competition rules established for this purpose.

CONSEQUENTLY

- All employees must make it their priority to achieve excellence in the quality of service and in internal and external customer care, managing promptly and rigorously the fulfilment of the obligations arising from the contracts entered into.
- All ENTEMA employees must strive to serve and understand the customer, anticipate their needs and meet them efficiently, for which they must provide clear and truthful information about the services.
- All employees must place the interests of the company and of the customer above their own in any product offer or provision of service to a customer carried out on behalf of ENTEMA,
- No employee shall provide false or misleading information about competitors, nor use it to carry out actions intended to discredit competitors.
- No employee shall engage in practices whose purpose or effect is, or may be, to prevent, restrict or distort competition and, in particular, those consisting of price fixing or fixing other commercial conditions or market sharing (cartels).

3.2.3 Relations with suppliers

For ENTEMA, relations with suppliers must be based on the quality of the services and products or services they offer, and on the integrity of their business practices, guaranteeing, in addition to socially responsible conduct, transparency, equal treatment and the use of objective criteria for their selection, as established at any given time by the internal procurement rules.

CONSEQUENTLY

- The selection and procurement of products or services from third parties must be carried out using objective technical, professional and economic criteria, always in line with ENTEMA's needs and interests, and in compliance with the internal selection and procurement rules established for this purpose.
- No relationships may be established with suppliers that break the law or the basic principles contained in this code of ethics.
- No ENTEMA employee may receive or offer sums by way of commissions or bonuses, or gifts or favours of any other kind, for actions they are carrying out on behalf of ENTEMA; courtesy gifts of symbolic value or promotional gifts are excepted.
- ENTEMA employees may not make, offer or receive, directly or indirectly, any payment in cash, in kind or any other benefit which, by reason of its value, characteristics or circumstances, could reasonably alter the course of the commercial, administrative or professional relationships in which they are involved.

Likewise, employees shall refrain from making facilitation payments or payments to speed up procedures, consisting of the delivery of money or other things of value, whatever the amount, in exchange for securing or speeding up the course of a procedure or action before any judicial body, public administration or official body.

ENTEMA employees shall not solicit or accept gifts or incentives, whether direct or indirect, where their value could give rise to an interpretation other than that of a mere token and whose purpose is to influence operations, or which could create conflicts of interest.

3.2.4 Relations with stakeholders

ENTEMA's relations with its partners must be based on the loyalty and integrity of their respective practices, transparency of information, a spirit of collaboration and the achievement of mutual benefit.

Consequently, ENTEMA employees must act towards partners in accordance with these principles.

3.2.5 Conflicts of interest

ENTEMA considers loyalty to be an essential value which, moreover, is compatible with the possibility of employees carrying out other business or professional activities, provided that they are lawful and do not conflict with their responsibilities as ENTEMA employees.

CONSEQUENTLY

- ENTEMA employees must act loyally and in defence of the company's interests.
- Employees must refrain from taking part in any professional or personal activity that could give rise to a conflict of interest with their work at ENTEMA. Likewise, they shall refrain from representing the company, taking part in or influencing decision-making on matters in which they themselves, close relatives or persons close to them have a personal interest, whether directly or indirectly.
- Employees who may be affected by a conflict of interest shall report it, prior to any decision being taken on the matter in question, to ENTEMA's ethics committee, so that the necessary measures can be taken to prevent their impartiality from being compromised.

3.2.6 Anti-corruption and Bribery

ENTEMA opposes unethical practices aimed at improperly influencing the conduct and will of people in order to obtain advantages.

Consequently, no employee shall accept or engage in bribery, or offer benefits for the benefit of third parties in the service of any organisation (public or private) in order to obtain advantages or do business, whatever its nature, and they shall report, through the established channels, any corrupt practices that come to their attention.

3.3 · SOCIAL RESPONSIBILITY

3.3.1 Action policy

ENTEMA's conduct is inspired by the principle of ethical and socially responsible action.

3.3.2 Environmental policy

ENTEMA is governed by an Environmental Policy, which defines as basic criteria the integration of the environment into the business, the development of environmental management actions and the promotion of environmental responsibility.

Consequently, all ENTEMA employees must accept and respect the Environmental Policy, complying with the rules of conduct established in this area at any given time.

Rational use of resources to reduce the environmental footprint, by monitoring them, minimising the consumption of water, paper and energy, reducing the generation of waste and encouraging its recycling, through the implementation of good environmental, energy and eco-efficient practices.

3.3.3 Transparency of information

The trust placed in ENTEMA by its various stakeholders is founded on the transparent, truthful and complete information that the company provides in all areas of its activity.

Consequently, all employees must take responsibility for ensuring that the information they provide is accurate, clear and truthful.

04 Compliance with the code of ethics and conduct

Compliance with the principles and criteria for action contained in this Code of Ethics and Conduct is mandatory.

No one, regardless of their level or position, is authorised to ask a professional to commit an unlawful act or one that contravenes the provisions of the corporate governance System or, in particular, the Code of ethics.

In turn, no professional may justify improper or unlawful conduct, or conduct that contravenes the provisions of the Code of ethics, on the grounds of an order from a hierarchical superior.

When the ethics committee determines that an ENTEMA professional has carried out activities that contravene the law or the Code of ethics, it shall instruct the management responsible for ENTEMA's human resources function to apply disciplinary measures in accordance with the system of offences and penalties set out in the collective agreement of the company to which ENTEMA belongs.

To guarantee the application of the Code, as well as the supervision and monitoring of compliance with it, an Ethics Committee shall be set up, with the following powers, composition and operating rules:

POWERS

The main functions of the Ethics Committee are:

Advisory

to answer queries on the interpretation of the principles and guidelines for action contained in this Code and to advise on how to act in certain situations.

Decision-making

to analyse and resolve complaints of non-compliance with the Code.

Oversight

to ensure compliance with the Code of Ethics and to propose updates to its content to adapt it to changes in the company, the market, society and legislation.

Promotional

to communicate and promote among employees the values and rules of conduct established in this Code.

COMPOSITION

The Ethics Committee shall be made up of two members and shall be chaired by a Management Officer designated for this purpose by General Management from among its members.

OPERATING RULES

Any employee who has doubts about the application of the Code, or who observes a situation that could constitute a breach or violation of any of the ethical principles and rules or rules of conduct established in this Code, must report it to the Ethics Committee, which shall act within the scope of its advisory functions or by resolving any complaints that may be raised for non-compliance with the Code.

QUERIES AND COMPLAINTS MAY BE SUBMITTED: THROUGH THE FOLLOWING ADDRESS:

buzoninterno@entema.es

The query or complaint must contain at least the following information:

- Identification of the person making the query or complaint.
- In the case of a complaint, its circumstances must be described in detail and, as far as possible, accompanied by the evidence or indications supporting it. It must also identify those responsible for the alleged irregularity.
- In the case of a query, the article of the Code on which clarification or interpretation is sought must be indicated, and the subject of the query must be described as precisely as possible.

The Ethics Committee shall hear and resolve the complaints and queries received, dealing with each of them as it deems most appropriate; it shall act in each intervention with complete independence and full respect for the persons concerned and shall guarantee, at all times, the confidentiality of the handling of the complaints and queries it processes.

All employees have a duty to cooperate in any investigations carried out into possible breaches of the Code.

> **The decisions of the Ethics Committee are binding** on the company and on the employees concerned.

Any breach of the criteria for action contained in this Code of Ethics and Conduct shall be penalised in accordance with the disciplinary regime in force, without prejudice to any other liabilities the offender may have incurred.

The Ethics Committee shall report to ENTEMA's Management Committee on the activity carried out, both in terms of interventions, advisory and decision-making, and in terms of actions to promote the Code of Ethics.

05 Annexes

ANNEX 5.1

Confidentiality undertaking

Mr/Ms _____, of legal age,

holder of ID (DNI) no. _____, residing at _____

in _____, with access to personal data Files,

owned by the company LABORATORIOS ENTEMA SL, with Tax ID (CIF) B60734639 and registered office at Pasaje Llobregat nave 8 Pl Cortes Sud, -08184 Palau Solita i Plegamans

UNDERTAKES TO

01 Maintain due secrecy and confidentiality regarding the personal data they become aware of in the course of their work, in accordance with current legislation on personal data protection, the General Data Protection Regulation (GDPR),

02 Not disclose or publish the data to which they have access, nor make them available to third parties, directly or indirectly, either in full or in part, for purposes other than those used in the workplace.

03 Respect all the technical or organisational security measures established by the company to guarantee the confidentiality of information containing personal data.

04 The obligations contained in this document are of indefinite duration and shall remain in force after the termination, for any reason, of the relationship with the owner of the File.

And to this effect, I sign this document,

In _____, on ____ of _____ 20___.

EMPLOYEE:

ANNEX 5.2

Employee consent

BASIC DATA PROTECTION INFORMATION	
Data Controller	LABORATORIOS ENTEMA SL Tax ID (CIF) B60734639 Registered office at Pasaje Llobregat nave 8 PI Cortes Sud, -08184 Palau Solita i Plegamans Telephone: 93 864 46 96 Data Protection Officer: Lorena Escartín E-mail: entema@entema.es
Purpose	At LABORATORIOS ENTEMA we process the information provided by employees in order to manage the human resources process, training, time recording, payroll management and payment, occupational risk prevention, and the company's management system
Legal basis	The legal basis for processing your data is the performance of an employment contract
Recipients	The recipients of the information are all the departments, divisions, premises and associates into which the company is organised, as well as the official bodies to which disclosure is required by law. The data will be disclosed to companies that provide services to LABORATORIOS ENTEMA in the areas of employment management, payroll preparation and occupational risk prevention management, as well as to customers for the coordination of business activities. A contract is in place between LABORATORIOS ENTEMA and these companies governing this data processing. The data will also be disclosed to the financial institutions with which the company works, in order to pay salaries.

Rights	Everyone has the right to obtain confirmation as to whether or not LABORATORIOS ENTEMA is processing personal data concerning them. Data subjects have the right to access their personal data, as well as to request the rectification of inaccurate data or, where appropriate, request its erasure when, among other reasons, the data are no longer necessary for the purposes for which they were collected. In certain circumstances, data subjects may request the restriction of the processing of their data, in which case we will only retain them for the exercise or defence of claims. In certain circumstances and for reasons relating to their particular situation, data subjects may object to the processing of their data. LABORATORIOS ENTEMA will stop processing the data, except for compelling legitimate grounds, or the exercise or defence of possible claims
Source of the data	The data subject
Data retention period	The personal data provided will be kept for as long as the contractual relationship is maintained. Once it has ended, and if the data subject requests their erasure, they will be kept for a maximum of 4 years, due to legal obligations.
Categories of data processed	• Identification data (Name, ID card (DNI), address, telephone, social security no.) • Personal characteristics data (Marital status, family data) • Academic and professional data (studies and professional experience) • Bank details • Medical fitness certificates • Fingerprint • CCTV images

Having read and agreed with the content of the preceding section, I hereby **EXPRESSLY CONSENT TO AND AUTHORISE** LABORATORIOS ENTEMA to process my personal data

SIGNATURE	NAME	DATE

ANNEX 5.3

Functions and obligations of users of personal data

REGULATIONS ON THE PROTECTION OF PERSONAL DATA

The General Data Protection Regulation (GDPR) governs the processing of personal data in companies and professional activities.

LABORATORIOS ENTEMA has implemented a series of measures to comply with the requirements of these regulations:

FUNCTIONS AND OBLIGATIONS OF ALL USERS

All personnel who access personal data are obliged to know and observe the measures, rules, procedures, regulations and standards that affect the functions they perform.

The obligations affecting users and all personnel who handle personal data are as follows:

- All persons must maintain due secrecy and confidentiality regarding the personal data they become aware of in the course of their work.
- Equipment and workstations are the responsibility of a User, who will ensure that the information displayed on this equipment is not visible to unauthorised persons. This means that screens, printers and any other devices connected to the workstation must be physically located in places that guarantee this confidentiality.
- When the User responsible for a piece of equipment leaves it for more than five minutes, they must leave it in a state that prevents access to the protected data. This will be done using the mechanisms provided by the Security Officer (screen saver, physically switching off the screen, logging off the system, etc.)
- In the case of printers, users must ensure that no printed documents containing protected data are left in the output tray. If printers are shared with other users who are not authorised to access the data in the File, those responsible for each workstation must collect the documents as they are printed.
- Connection to external networks from equipment that contains or has access to personal data protected under these regulations is prohibited. It may only be done with the prior authorisation of the File Controller.
- The installation of applications or significant changes to the Operating System configuration that have not been authorised by the Security Officer or Authorised Administration is prohibited.
- Each User is responsible for the confidentiality of their password and, if it becomes known to unauthorised persons, this shall be reported as an incident and the password shall be changed using the established procedure.
- Users are obliged to report any incidents they become aware of to the Security Officer so that they can be entered in the Incident Register. A user's knowledge of an incident and failure to report it shall be considered a breach of the security of the File by that user.

- Anomalies that may affect security and that will be considered Incidents are:

  Software problems | Hardware problems | Communications problems | Loss of information | Other incidents

- PC workstations shall have antivirus software installed, which shall be kept up to date and remain resident in the system. Users may not deactivate this protection.
- If a user considers it necessary for their work to store data covered by the GDPR on any computer storage medium, they shall be responsible for putting appropriate security measures in place and for informing the Security Officer.
- Users shall also be responsible for protecting the confidentiality of any non-automated media at their workstation for processing.

CONSEQUENCES OF NON-COMPLIANCE

Failure by the personnel concerned to comply with the obligations and security measures established in this document shall be penalised in accordance with the provisions of the General Data Protection Regulation (GDPR).

All persons with access to the data in the File are obliged by Law to comply with the provisions of this Document, and are subject to the consequences they may incur in the event of non-compliance.