



CODE of Ethics





SAVAL

INVESTMENTS



CODE OF ETHICS

SAVAL
INVESTMENTS

TABLE OF CONTENTS

INTRO - MESSAGE FROM THE CEO	7
How to use this code of ethics?	
How to get help?	
How to ask questions or report potential violations?	
OUR PURPOSE	10
Our principles	
What do these principles consist of and how are they applied?	
OUR RESPONSIBILITY	12
Prevention of criminal risks	
Anti-corruption, bribery and/or fraud	
Gifts, entertainment and hospitality	
Donations and sponsorships	
OUR COMPANY	13
Corporate Asset Protection	
Our Data: Information Security, Privacy and Confidentiality	
Participation in political affairs	
OUR PRODUCTS	16
Quality and safety control of our products	
Industrial and Intellectual Property	
OUR BUSINESS	16
Conflicts of interest	
Accounting transparency and accurate records	
Environment and Sustainability; (ASG)	
The community	
OUR PEOPLE	18
Labor aspects	
OUR THIRD PARTIES	20
Patients, customers and/or end users	
Health Professionals and Institutions	
Suppliers and Business Partners	
OUR RELATIONSHIP WITH THE COMPETITION	21
OUR RELATIONSHIP WITH REGULATORS AND/OR AUTHORITIES	21
OUR COMMUNICATION CHANNELS	22
TRAINING	23
DISCIPLINARY REGIME	23

Capitalized words not expressly defined in this document shall have the meaning established in the document "List of SAVAL Definitions" which is available on the SAVAL Intranet.



SAVAL
INVESTMENTS

A message from our CEO

At SAVAL, we are committed to meeting the highest standards in everything we do, from manufacturing our medicines to marketing them in all the countries where we operate.

This commitment has been present since our beginnings, more than 85 years ago, and is a true reflection of our purpose: to take care of people's health with quality, access and efficiency, always.

This purpose has driven us to grow with the times and changes in the industry and today allows us to have an important presence in Latin America, as evidenced by the recent incorporation of Laboratorios Saval Costa Rica.

It is our values and principles, which define our corporate identity, that have brought us this far and that will allow us to go further, doing the right things to achieve our goals with integrity.

For this reason, I am proud to present you with our new Internal Regulations, which consist of this updated Code of Ethics, applicable in all the countries in which we operate; and which, together with our updated Corporate Policies, will serve as a guide to make the right decisions and develop our activities in a manner consistent with our values.

I invite you to live through these principles every day, through your example and your commitment, and to challenge and report any behavior that does not align with our values so that we can continue to grow together, for many years to come.



Alejandro Saval Bravo
President

How to use this Code?



All members of SAVAL are subject to this Code of Ethics, regardless of their function, level and/or geographical location, as it provides a set of principles for acting ethically in the daily activities of the organization.

As for SAVAL's management and leaders, they are responsible for leading by example and ensuring that all those who are part of SAVAL are aware of this Code of Ethics and act in accordance with the principles and values embodied in it.

Where necessary, local management will implement additional measures to meet specific requirements of each country in which SAVAL operates.

Of course, our Code of Ethics cannot cover all possible situations that members of the organization may face; it only provides the basic tools for making the right decisions.

When we have to make a complex decision and it is not clear exactly what to do, we should always ask ourselves first, for example:

1.- Is it legal?

2.- Is it coherent with the values and principles of the Code of Ethics and with the internal policies of the organization that would be applied in such a situation?

3.- Does it seem right, or would I feel uncomfortable having to explain my behavior to management, family, friends or the media?

4.- Who might or could be affected by my decision/behavior, and if so, would they consider it fair?

If, after asking these questions, you are still unsure of the correct position, you should contact your management or the Compliance Team and/or the Corporate Legal Department.

Let's always remember that approaching a complex ethical situation with integrity, transparency and objectivity, while counting on the support of the team, will enable us to do the right thing and be effective and efficient.

SAVAL will promote a continuous training framework to improve the understanding of the organization's internal regulations and to reinforce the commitment to our core values and principles.

SAVAL expects all its members to accept the obligation to promote and ensure compliance with applicable local laws and the organization's internal regulations, to act with integrity and to lead by example.

In addition to this Code of Ethics, SAVAL has implemented a group of Global Policies that we must comply with, which are detailed in [-] according to their relationship to each section of this code.

How to get help?

In SAVAL we are a great team, in case of doubts or questions regarding our internal rules or any specific situation, the managers and/or the Compliance and Legal teams are always available to help us.

SAVAL's compliance function is structured on different levels: Global, Regional and Local.

This function is responsible for promoting a comprehensive ethical culture, managing compliance and respect for the rules with a global approach and local sensitivity. The Compliance team reports regularly to the organization's management.

How to ask questions or report possible violations?

If you have any doubt, questions or suspicion regarding a violation of the Code of Ethics, SAVAL policies, local laws and/or regulations or professional standards, you shall contact Human Resources, the Corporate Legal Department and/or Compliance.

All investigations and data processing will be conducted with the utmost confidentiality and, where necessary, with

appropriate measures to protect bona fide whistleblowers. Investigations will always be conducted with the presumption of innocence and the opportunity to be heard.

Retaliation of any kind against whistleblowers acting in good faith is strictly prohibited and, if it occurs, will constitute a violation of the Company's internal rules. Likewise, false information or reports made in bad faith or for illegitimate reasons will result in disciplinary action.

SAVAL expects all its members to report any situation - including suspicions - of violation of laws, regulations and/or internal rules of the organization for appropriate treatment.

Some examples of such situations may include:

- Criminal activities such as corruption, bribery and/or fraud;
- Abuse or discrimination in the workplace;
- Acts that endanger workplace safety and/or may cause damage to facilities or the environment;
- Acts that endanger employees or third parties;
- Opaque accounting practices or falsification of documents;
- Failure to comply, either by action or omission, with local regulations or organizational standards.

Our Purpose

We take care of people's health, with quality, access and efficiency, always.

Our values and principles

SAVAL SAVAL is committed to achieving its purpose by consistently acting with integrity, maintaining the highest standards and ensuring full compliance with all applicable laws and regulations in each country in which it operates.

Therefore, SAVAL expects that our values and principles will always prevail in our relationships with members of the organization, authorities and/or regulators, competitors, suppliers, customers, patients and the broader community.

What are our principles?



Principle N° **1**

We are
a global
team



Principle N° **2**

Meeting the
highest
standards in
everything we
do



Principle N° **3**

We respect
and care for
people and the
environment



Principle N° **4**

We innovate
and
continually
improve



Principle N° **5**

Enabling us
to make
decisions
with agility

We must always remember that a fundamental part of our business is how we conduct it, and SAVAL will neither tolerate nor support arbitrary decisions or compromises to its core principles and values in pursuit of better results.

What do our values consist of and how are they applied?

INTEGRITY: The highest ethical and moral principles, such as honesty, fairness and decency, must govern all of the company's activities. Acting with integrity means always striving to make the best decisions regardless of the circumstances, while fully complying with laws, regulations and internal policies in all we do.

TRANSPARENCY: SAVAL promotes truthfulness and objectivity in its relationships as the foundation for building trust and creating value with our patients, third parties and other stakeholders.

COLLABORATION: SAVAL has a diverse and cohesive team where mutual respect and best intentions are promoted to create a cooperative environment and good coexistence, enhancing the skills and abilities of all to achieve the organization's goals.

EXCELLENCE: One of the goals of the organization is to meet the highest standards in everything it does, and this is

a continuous task. SAVAL works responsibly and reasonably to fulfill its commitments to patients, customers, suppliers and the environment, always paying attention to quality, time and form, which allows the organization to adapt quickly and stand out in a highly competitive environment.

PROACTIVE VISION: SAVAL's team is always thinking ahead, able to anticipate changes and adapt in an agile and creative way to the needs of the environment, seeking new opportunities and challenges, being innovative in the way we meet the needs of our customers.

SAVAL expects all its members to be proud to belong to the organization and that their actions and decisions are consistent with the values and principles that govern our way of doing business.

This Code of Ethics is a fundamental guideline for each member of SAVAL to maintain and promote mutual respect and correct procedure in all our activities.

Our responsibility

SAVAL expects all its members to act with integrity in all their actions, to understand and comply with the regulations of the regions where the organization operates and to take responsibility for making ethical and informed decisions.

Compliance is a shared responsibility that requires direct, transparent and objective communication about any concerns that may arise in our business activities. In situations of uncertainty, complete and objective information must be shared with our leaders, the Corporate Legal Department, and/or Compliance to ensure timely and relevant support for making the best possible decision and achieving an appropriate and comprehensive resolution.

SAVAL expects all its members to uphold the responsibility to promote and ensure compliance with applicable laws and the organization's internal regulations, to act with integrity and to lead by example.

PREVENTION OF CRIMINAL RISKS

SAVAL is committed to society and the authorities to respect and comply with all the laws in force in the countries where we operate, particularly those that regulate the fight against crimes that may be related to the organization's operations or the activities of its members in the performance of their corporate functions.

For this reason, the Organization has established specific policies and procedures for the management of criminal risks in order to prevent the commission of crimes related

to the activities carried out within the framework of our business.

SAVAL commits, promotes and requires all its members to understand, adhere to and ensure compliance with internal risk management and control systems, as well as crime prevention models and policies that may in any way affect the organization's operations..

ANTI-CORRUPTION, BRIBERY AND/OR FRAUD

SAVAL has a zero-tolerance policy towards crime and strictly prohibits any form of corruption, both public and private, including extortion, bribery, kickbacks and influence peddling. The organization also does not tolerate business practices aimed at obtaining personal or commercial advantage through the direct or indirect use of improper or inappropriate means:

WHAT IS CORRUPTION?

It consists of offering, promising, giving or accepting, either directly or indirectly, an undue advantage to or from a public official or an employee/agent of a private company with the intent to obtain or retain business or gain any other unlawful advantage.

No member or third party associated with SAVAL is authorized to engage in activities that could compromise the organization in corrupt situations, even if only apparent. Such conduct is expressly condemned by the organization and is subject to sanctions.

A third party may be an external or independent collaborator, supplier or business partner of SAVAL that participates in or helps generate or retain business for the organization.

Currently, in most parts of the world, it is illegal to engage in acts of corruption, bribery, kickbacks, improper gifts of any kind, or, in short, to engage in fraudulent acts aimed at improperly obtaining or receiving favorable treatment from a public official, domestic or foreign, with the intention of improperly influencing a business opportunity or activity that allows the continuity of business.

Facilitation payments are those of relatively small amounts, illegal and improper, offered and/or demanded by a public official to expedite the completion of an administrative procedure/procedure (e.g.) or the duties of a low-level official.

The payment of administrative fees to expedite procedures that are duly regulated by an official legal body and for which we receive proof of payment does not constitute a “facilitation payment”.

All members and third parties collaborating in the execution of SAVAL's business, regardless of their location, are obliged to comply with the applicable anti-corruption and/or anti-fraud regulations. Failure to comply with these rules may expose SAVAL to reputational damage, significant fines, loss of trust from our patients and clients, and even criminal penalties for both the company and the individuals involved.

DONATIONS AND SPONSORSHIPS

SAVAL is committed to conducting its business activities in a socially responsible manner, recognizing that modern companies, especially in the pharmaceutical sector, have a role that goes beyond the mere production and sale of medicines and wellness products. They also contribute to social welfare and development through donation and/or sponsorship programs.

However, SAVAL also recognizes that these tools designed to achieve social goals can be misused for illicit purposes or in ways that distort their intent. In this regard, and in accordance with our values and core principles of integrity and respect for the law, we remain vigilant.

Donations and/or sponsorships made by SAVAL shall be made only in accordance with the applicable laws in force, ensuring full transparency. These actions must comply with established policies and procedures with proper documentation and record keeping.

Our company

USE OF CORPORATE ASSETS

Members of SAVAL must take care of and make efficient use of the equipment and facilities entrusted to them for the development of the functions and the fulfillment of the organization objectives, which in turn includes the reasonable prevention of any damage (deterioration, loss, theft, etc.) to the tangible assets (IT equipment, supplies, industrial machinery, etc.) or intangible assets (information, know-how, intellectual property, etc.) of the organization.

In SAVAL, all its members must:

- Manage corporate assets efficiently and responsibly: Corporate assets are intended solely for the development of the organization's activities. Personal use should be limited and should not compromise the performance or safety of people, processes or facilities, nor violate laws or internal regulations.
- Protect the financial assets of the organization: We must use the funds provided for the development of business activities in a reasonable and justified manner. These activities must be documented and all supporting documentation, including invoices, receipts and other relevant documentation of expenses incurred, must be retained..
- Protect the Company's confidential or sensitive information: We must protect confidential or potentially sensitive information, such as details of new product development, business strategies, access codes and similar related data and/ or information.

OUR DATA: INFORMATION SECURITY, PRIVACY AND CONFIDENTIALITY

SAVAL operates in a highly regulated and competitive industry and devotes significant resources to product development and overall business strategy. This process generates valuable information that must be protected and is accessed by all members of the organization in the performance of their duties.

On the other hand, and equally important, as the organization's activities develop, it receives a great deal of information from third parties that must be properly handled and protected. In today's highly international business and professional environment, much of the world has adopted regulations governing the processing of personal data, often with extraterritorial application.

These privacy and personal data protection laws typically protect the collection, use, processing, disclosure, and

transfer of personal information, while providing rights of access, modification, and/or deletion. In addition, these regulations impose significant penalties that can impact the organization's reputation and finances.

The organization expects all of its members to responsibly use and protect corporate information, whether stored in physical or digital form, to prevent breaches that could jeopardize business continuity or violate applicable regulations.

EXAMPLES OF SENSITIVE OR CONFIDENTIAL BUSINESS INFORMATION:

- Business processes: Information related to human resources, sales, marketing, and/or corporate databases; commercial or marketing strategies; business ideas and/or proposals; non-public financial information; and others.
- Product-related: Undisclosed technical data from ongoing research or R&D; confidential product information or trade secrets; material related to new product development or permit/license applications.
- Third Party: Confidential or sensitive information from third parties (customers, patients, medical trial participants, suppliers, etc.); technical data shared for business purposes, commercial plans or strategies entrusted by business partners, etc.

The organization expects all its members to exercise discretion and observe the duty of secrecy and/or confidentiality, as applicable, with respect to company information to which they have access in the performance of their duties.

SAVAL members shall not use the organization's confidential information for purposes unrelated to the business:

i) They shall not disclose it to third parties unless such disclosure has been previously authorized in writing and accompanied by a duly signed agreement by both parties.

ii) In the event of a request for information from a governmental and/or regulatory body, the request must be coordinated and channeled through the Corporate Legal Department to ensure timely and appropriate compliance with the information request.

iii) Always adhere to and comply with the Company's information security and privacy policies and procedures, where the approval matrix is established based on the sensitivity of the information to be shared.

The security, privacy and confidentiality of all corporate information of the organization, including the personal data of our members, our clients, current and/or potential customers, suppliers and strategic business partners, must be protected in accordance with the applicable laws of the jurisdiction in which SAVAL operates.

Members of the organization must assume the obligation and responsibility to comply with cybersecurity policies, protocols and/or guidelines to protect corporate information stored on devices, servers and/or the organization's network in light of the increasing risks of piracy, hacking or other similar threats, as well as virus infections or other similar attacks.

SAVAL emphasizes the importance of promptly reporting to the IT, Legal and/or Compliance Departments, through the designated channels, any breach discovered in the Company's information systems or involving Company information in any form (physical or digital).

A breach of confidentiality obligations or improper disclosure of sensitive information can expose the organization to

significant legal and/or reputational risks and may result in sanctions against the offender. Depending on the severity of the act, this could result in termination of employment in accordance with applicable employment laws.

When in doubt about the appropriate handling of confidential information or the management of its security and privacy, contact the Corporate Legal Department and/or the organization's Compliance Department.

POLITICAL PARTICIPATION AND/OR ACTIVITY

As a business organization, SAVAL does not take part in or adopt specific positions on political trends or processes that could compromise its neutrality and objectivity or that are unrelated to the development of its business. However, this does not prevent members of the organization, as individuals within society, from participating in legally recognized political activities, provided that such activities do not violate public order and meet the following conditions

- They are carried out in personal time with the individual resources of the members participating in them; company resources should not be used, work time should not be allocated for this purpose and/or professional performance should not be compromised;
- Opinions expressed in this context must be individual and should not be understood as an expression or position of the Organization. In developing these activities, members may not speak on behalf of SAVAL at any time.
- When there is a possibility of actively joining a political affiliation, or when there are plans to participate in or be appointed to public office, either personally or for a close relative, significant information must be disclosed transparently to avoid or manage any potential conflict of interest.

Our products

QUALITY AND SAFETY CONTROL OF OUR PRODUCTS

SAVAL is committed to protecting health, effectively preventing disease and promoting healthy lifestyles by offering a wide range of both accessible and high quality products. We strive to ensure that our products consistently meet the highest standards of quality and safety.

We have an ethical and legal obligation to monitor and report adverse or unanticipated effects of our products, as well as quality issues, to the relevant regulatory authorities.

Although the manufacturing process and the raw materials used in our products are thoroughly controlled and rigorously tested during clinical trials, the performance and safety of such products can often only be fully verified in actual use.

In the event of any adverse or unexpected effect, or if you are aware of any pharmacovigilance incident, please report it promptly through our dedicated channel: www.savalcop.com/farmacovigilance/. The more information we have about a product's performance, the better we can ensure its quality and safety.

INDUSTRIAL AND INTELLECTUAL PROPERTY

At SAVAL, we must protect our own intellectual property and respect the intellectual property of others.

Innovation, through research and development of new compounds or techniques, provides us with a competitive advantage in the marketplace. The organization expects all

its members to protect and use these rights and knowledge responsibly.

Industrial property includes not only patents and registered trademarks, but also the content of research or ideas not yet patented, technical and/or scientific knowledge, and even the experience acquired by the company throughout its activities.

SAVAL expects all its members to respect the intellectual property rights of third parties. Unauthorized use or misappropriation of these rights is prohibited and will result in legal consequences for both the individual and the company.

Our business

CONFLICTS OF INTEREST

The development of SAVAL's business may involve situations in which private interests may conflict with the interests of the organization, whether the conflict is real, potential or apparent. Such conflicts must be identified and managed appropriately.

A conflict of interest arises when a personal interest may compromise our objectivity, professionalism and ability to act in accordance with the interests of the organization in the performance of our duties and/or obligations.

SAVAL members must avoid any situation that implies or may imply a conflict of interest and that may compromise their independence and integrity in the performance of their duties.

Objective and transparent communication is essential in managing conflicts of interest. If in doubt about the potential existence of a conflict, members should consult SAVAL management and/or Compliance.

Actual, potential or apparent conflicts of interest must be recorded in a register, which will be used to review their management and the measures or controls implemented to mitigate the associated risks.

SAVAL members should always consider, among the activities in which they have or may have an interest, those activities or businesses in which their partners may have an interest, as well as those involving: relatives, including parents, children, siblings, in-laws or third parties living in the same household or with whom the member has a close personal, intimate or sentimental relationship.

WHAT TYPES OF CONFLICTS OF INTEREST MUST BE REPORTED? FOR EXAMPLE:

- Having a personal financial or other interest in selecting one third party over another to provide the same service, supply or product.
- Undisclosed family or intimate relationships, such as: Those involving existing members of SAVAL; A close relative in a position of influence within a direct competitor; A relationship with a direct or indirect hierarchical superior in the same department, a person holding a political position or serving as a public official, particularly in areas related to the organization's activities, among others.
- Other information to be disclosed in order to avoid conflicts of interest: Having an economic interest equal to or greater than 10% in a supplier or customer of SAVAL, or providing services to them, or having an employment relationship with them."

ACCOUNTING TRANSPARENCY AND ACCURATE RECORDS

In accordance with SAVAL's ethical and legal commitments to its economic development, all financial, economic and operational activities must be recorded in a timely, complete, transparent and accurate manner. These activities must comply with applicable laws, generally accepted accounting standards, and the organization's internal policies and procedures. Appropriate systems, controls and audits should be in place to ensure the reliability, accuracy and integrity of our accounts, records and reports.

Transactions must be fully documented and maintained through a detailed system of records that ensures traceability, whether the data is stored in physical, digital, or any other format.

SAVAL expects all its members to understand that the improper alteration, concealment, destruction or falsification/ forging of documents or data may constitute fraud and may result in personal civil and/or criminal liability, in addition to the reputational risk it poses to the organization.

Similarly, we must act responsibly when disclosing financial and/or accounting information and avoid providing false, misleading or dishonest information, whether internally or externally. Such conducts are strictly forbidden.

SUSTAINABILITY

SAVAL, aware of the importance of preserving and protecting the environment, is committed to developing its activities according to sustainable and viable operating principles and criteria. The organization strives to implement industrial practices that respect the environment, always complying with the legislation in force.

The organization expects all its members to actively participate in these efforts, to be familiar with local regulations, to comply with programs, policies and/or procedures designed to protect and preserve the environment, and to report any situation in our operations that may pose an environmental risk.

THE COMMUNITY

SAVAL, aware of its role as a key player in protecting health, effectively preventing disease, promoting healthy lifestyles and making a positive impact on modern society, reaffirms its commitment to the community through programs that reach those most in need.

These programs are designed in accordance with applicable laws and our internal policies and are implemented through direct collaboration or in partnership with non-governmental organizations or independent third parties.

Our people

LABOR ASPECTS

SAVAL is committed to complying with and enforcing applicable local and international labor regulations. We pay special attention to the well-being of our employees by ensuring respect and dignity, promoting equal opportunities and diversity, guaranteeing health and preventing occupational hazards.

In this regard:

- Respect and dignity are fundamental to creating a positive work environment at SAVAL. We do not tolerate any form of discrimination, whether based on age, gender, nationality, ethnicity, religious beliefs, political views, state of health, sexual orientation, disability or any other reason. We also reject any behavior that may constitute harassment, including verbal, psychological, sexual or physical harassment.

WHAT IS WORKPLACE HARASSMENT?

Workplace harassment is unjustified and inappropriate hostile conduct that occurs systematically with a specific goal in mind, such as trying to get the victim to quit his or her job or forcing the victim to tolerate abusive conditions. Harassment can take many forms, including verbal, nonverbal or physical. Sexual harassment manifests itself through attitudes such as unwanted sexual advances or requests, and may also include humiliation, threats, intimidation, and other abusive conduct”.

In this context, SAVAL pays the utmost attention to the prevention of any kind of abuse or harassment, whether labor or sexual, as they are illegal, unjust and contrary to human dignity and a healthy work environment. The organization expects its members not to tolerate these behaviors and, if anyone witnesses or experiences any abusive situation or harassment, to report it immediately through the designated channels.

- SAVAL values first and foremost the ability and merit of individuals and is committed to promoting equal opportunity and diversity.

The organization focuses on ensuring a safe environment and objective processes in which all individuals are included with equal opportunities in hiring, training, compensation, promotion and professional development based on their knowledge and skills in a continuous pursuit of excellence.

As an international organization, SAVAL fosters an environment where diversity is seen as a key strength

and a fundamental part of its identity. All members are encouraged to feel included, share their experiences and grow professionally within a cohesive organizational culture.

Fostering an inclusive environment allows us to fully develop our skills, have more tools and resources, and be more innovative.

SAVAL expects all members to actively promote and support inclusive, cross-functional teams where the unique characteristics and circumstances of each colleague are recognized with empathy. The organization fosters an environment that enables everyone to reach their full potential and contribute to their personal and professional growth. In addition, all members are expected to promptly report any violations of the Company's internal policies through the designated reporting channels..

- Another fundamental priority of SAVAL is to guarantee a safe working environment where health and prevention of occupational hazards are a priority. The organization fulfills this commitment in two ways: first, by complying with the applicable laws and regulations regarding occupational health and accidents prevention in each location where it operates; and second, by providing continuous and ongoing training to all members on the awareness and prevention of occupational hazards and accidents at work. In addition, the organization actively supports the reconciliation of work and family life, giving priority to the care, well-being and protection of personal and family time.

Alcohol and drug use in the workplace: Occupational health and safety is a responsibility shared by all SAVAL members. Therefore, members must not perform their duties while under the influence of alcohol and/or illegal drugs. At company social events organized or sponsored by the company, members who choose to consume alcohol are expected to do so responsibly and maintain their professional image.

Our stakeholders

PATIENTS, CUSTOMERS AND/OR END USERS

SAVAL, committed to excellence, promotes a high level of customer satisfaction through research and development of products and services of the highest quality. This commitment maintains its relationship with customers based on trust and continuous improvement, always prioritizing their benefit.

At all times, the members of the organization must consistently adhere to the highest industrial, commercial and financial practices, promoting cooperative relationships based on strong ethical and professional standards.

In these relationships, respect, understanding, goodwill and courtesy to our customers must always be paramount.

WITH OUR HEALTHCARE PROFESSIONALS AND ORGANISATIONS (HCP & HCO)

SAVAL's interactions with healthcare professionals and organizations must always adhere to ethical standards, be appropriate and professional, and comply with both applicable laws and SAVAL internal regulations.

These interactions should be designed to create opportunities to educate healthcare professionals about medicines and the latest advances in the pharmaceutical industry. This includes providing scientific and educational information, supporting research, and facilitating medical education, all with the goal of advancing and improving the industry, the

practice of medicine, and ultimately benefiting patients.

Any sponsorship or financial support provided by the organization to healthcare professionals and/or organizations must be aimed at providing scientific and educational information and/or disseminating knowledge about medicines or the latest advances in the pharmaceutical sector, always with the goal of benefiting the practice of medicine and promoting the development of the industry. In addition, such sponsorships must fully comply with local laws and regulations, and their management, approval and documentation must be conducted in accordance with established procedures.

In addition, all promotional activities and interactions intended to promote the organization's image and products to healthcare professionals, including the provision of communications or scientific information in any format, must be conducted in a manner that is appropriate, truthful and not misleading. These activities must also comply with local regulations and established medical standards.

Promotional activities and interactions designed to promote the organization's image and products to healthcare professionals, including the distribution of product samples, must comply with local laws, meet internal minimum value policies, and be properly documented in accordance with SAVAL procedures.

WITH OUR SUPPLIERS AND BUSINESS PARTNERS

SAVAL interacts with third parties to ensure the effective execution of its activities, cultivating and maintaining mutually beneficial relationships with its suppliers and business

partners who play an important role in our operations. In these interactions, compliance with applicable laws and internal regulations must be a priority, as well as compliance with the terms and conditions set forth in the agreements or contracts entered into.

The selection of suppliers or business partners will always be based on a prior, fair and transparent process in which objective criteria - such as quality, efficiency, service and reputation - are prioritized, ensuring alignment with appropriate commercial, ethical and environmental standards, and in strict compliance with the protocols established by the organization.

SAVAL will not tolerate or accept the receipt or provision of any compensation, payment or gift of any kind, from or to any national or international supplier, which is intended to influence the independence of judgment or to induce any form of preferential treatment for the benefit of SAVAL or any of its members, particularly in the selection of suppliers or business partners, in detriment of our internal protocols.

With our Competitors

SAVAL promotes free competition as a fundamental component of a market economy and recognizes it as a key mechanism for organizing economic activity. From the standpoint of individual freedoms, free competition serves as a central pillar of free enterprise, a principle in which the organization firmly believes and advocates.

To this end, the organization promotes a respectful, courteous and dignified relationship with its competitors, ensuring that

compliance with the ethical and legal standards governing the activity must remain a priority and is conscientiously maintained.

SAVAL expects its members to always act in accordance with the law on competition and the organization's internal regulations and, above all, to always be aware that it is prohibited to

- Participate in agreements to share markets and/or customers.
- Participate in discussions regarding pricing, costs, business strategies, terms and/or conditions of sale.
- Participate in discussions or agreements with third parties for the purpose of unreasonably or unfairly restricting or excluding competitors from the marketplace
- Participate in discussions or agreements involving combinations that are considered illegal under the rules of free competition.

Competition rules may vary from country to country, so if you have any concerns, remember to contact the Corporate Legal and/or Compliance Department first.

Exceptions to the above include information about competitors and market strategies lawfully obtained by members of the organization.

OUR RELATIONSHIP WITH REGULATORS AND/OR AUTHORITIES

The Organization operates in a highly regulated environment and, as such, expects its Members to exercise due diligence to ensure compliance with the specific regulations relating to the licenses and permits required for its operations, as well as any other applicable legal requirements.

In this regard, any formal requests or requirements from regulatory bodies and/or local authorities must be addressed in a timely, comprehensive and sufficient manner. This process shall be managed by the relevant technical department, which may seek the assistance of the corporate legal department and/or local legal advisors, as required.

The local legal department should be notified promptly of all requests for information, routine or otherwise, and of all planned or unplanned visits to SAVAL facilities, in order to properly receive and assist officials in the performance of their duties.

The organization expects its members to always comply with local laws and regulations as well as our internal policies. In case of doubt, members should seek guidance from the Corporate Legal Department and/or Compliance.

OUR INFORMATION CHANNELS

All members of SAVAL undertakes to report any irregularity, violation or breach of applicable laws or the organization's internal regulations as soon as they becomes aware of it.

SAVAL will not tolerate any form of retaliation against anyone who, in good faith, raises a legitimate concern about a possible violation. Nor will retaliation be tolerated against anyone who cooperates in an investigation of a violation.

Any act or threat of retaliation against a member of SAVAL will be treated as a serious violation of our Code of Ethics and will be subject to disciplinary action.

Violations of SAVAL's internal rules, or reasonable suspicions thereof, should be reported through the following channels:

ETHICS CHANNEL, MANAGED BY AN EXTERNAL COMPANY INDEPENDENT OF SAVAL, THROUGH THE FOLLOWING COMMUNICATION CHANNELS:

1.- E-mail: denuncias.savall@resguarda.com

2.- Web platform: www.resguarda.com/saval,

3.- Through the toll-free telephone numbers:

Bolivia: 800 100 605

Chile: 800 835 133

Spain: 900 43 31 07

Costa Rica: 0-800-054-1046

Peru: 0-800-00932

Panama: 011-00800-052-1375

Paraguay: 009-800-521-0056

WHAT TYPES OF MATTERS SHOULD BE REPORTED THROUGH THE VIOLATION REPORTING CHANNEL? FOR EXAMPLE:

- Fraud, corruption and/or related crimes;
- Disclosure of intellectual property, privileged or confidential corporate information;
- Violations of market and/or consumer regulations (Antitrust)
- Harassment and/or discrimination;
- Damage to company property;
- Pharmacovigilance issues;
- Environmental damage;
- Computer or cybersecurity crimes.

For matters of a different nature, please contact directly:

1. Hierarchical supervisor (direct or indirect, as the case may be);
2. Human Resources;
3. Compliance and/or Legal Department.

- To the Corporate Legal Department and/or the Compliance function, through: ***compliance-es@savalinvest.com***

- Personally, to the Compliance Officer or Delegate, as appropriate.

- To their managers, who are responsible for reporting the matter in the most expeditious manner possible through any of the above channels

The Compliance Officer, while maintaining the confidentiality and privacy of the information provided in the complaint and the identity of the complainant (if disclosed), will review and analyze the background information provided. If warranted, the Compliance Officer will initiate an investigation in response to the request and ultimately issue a conclusion regarding the complaint in accordance with applicable policies and procedures.

Finally, the Compliance Officer may also act upon the request of any SAVAL third party who submits a complaint through the reporting channel.

OUR EXTERNAL COMMUNICATIONS

SAVAL's external communications are strictly reserved to spokespersons authorized by the organization. No member may represent or speak on behalf of the organization without prior authorization.

Communications with the press, whether through physical or digital media, and by any means including (radio, television and including social networks), must undergo prior review and receive authorization from the Communications Committee, department or designated person entrusted with this responsibility.

For any questions regarding this matter, please contact the Committee ***atcomunicaciones@savalcop.com***

TRAINING

Training on this Code and other internal regulations will be provided to SAVAL members in accordance with the training program approved for this purpose by the Board of Directors.

This Code, together with all other applicable internal regulations, will be made available on the organization's intranet to ensure that members can consult them at any time.

Periodic internal communications will be issued to raise awareness and keep SAVAL members informed on matters related to this Code and other topics of interest outlined in the organization's global policies.

In the event of violations and/or non-compliance with this Code, additional and specific training may be required in addition to appropriate disciplinary action.

DISCIPLINARY REGIME

Failure by any member of SAVAL to comply with this Code of Ethics will be considered a serious breach of his or her responsibilities to SAVAL and may result in the imposition of disciplinary action, up to and including termination of employment, in accordance with applicable local regulations.

MODIFICATIONS AND CHANGE HISTORY

This Code, as well as other internal regulations of SAVAL, will be reviewed periodically according to the established review schedule. Amendments may be made as necessary when circumstances arise that warrant or require such review. In particular, the following situations may trigger a review

- Changes in regulatory requirements, both external and internal;
- Organizational changes, either in the internal structure of the organization or through the creation of new business lines;
- Decisions by the governing body or senior management to address identified needs;
- Proposals from the compliance function or the responsible technical area;
- Identification of improvements that increase the effectiveness or efficiency of the risk control and management system.

Modifications and Change History

VERSION	DATE OF UPDATE	RESPONSIBLE	CHANGE MADE
1.0	12/2012	Mr. Fernando Corvalán	<ul style="list-style-type: none">• First version
1.1	10/2013	Mr. Fernando Corvalán	<ul style="list-style-type: none">• Format change
1.2	05/2016	Ms. Andrea Reinoso	<ul style="list-style-type: none">• The application to subsidiaries is formalized.• Introduction is included, including the Objectives.• Update on Initial Considerations, Ethical Guidelines, Duty to Report and International Ethics Committee.
1.3	05/2020	Ms. Wanja Heimpell	<ul style="list-style-type: none">• Items II, III and IV are updated.• Whistleblower channels and International Ethics Committee• Updated New principles and regulations are incorporated
1.4	10/2020	Mr. Vicente Martínez	<ul style="list-style-type: none">• Values and corporate mission are updated
2.0	11/2023	Compliance	<ul style="list-style-type: none">• Restructuring and general update of the Code
2.1	06/2024	Compliance	<ul style="list-style-type: none">• Update and harmonization of terminology and format

SAVAL
INVESTMENTS

Grupo **SAVAL**
savalcorp.com

