



**POLICY ON THE USE
OF THE ETHICS CHANNEL**

I. INTRODUCTION

Pursuant to the provisions in Act 2 of 20 February 2023 on regulating the protection of persons who report regulatory infringements and preventing corruption, the MEDICHEM GROUP (hereinafter referred to indistinctly as MEDICHEM or the Group) has set up an internal mechanism to report possible infringements (Ethics Channel) and to submit doubts and queries related to the interpretation and application of its compliance system.

II. WHAT CAN BE REPORTED THROUGH THE ETHICS CHANNEL?

- Any infringement of the compliance system and other internal MEDICHEM regulations, as well as of the values, guidelines for action or rules of conduct contained therein.
- Any infringement of applicable legislation in force.
- Any contingency that could pose a threat to MEDICHEM's reputation.
- Doubts or queries about the application of the compliance system.

In any case, the content of the report must be related to conduct or acts committed by collaborators and third parties to whom MEDICHEM is professionally related or linked, or doubts about the compliance system.

III. WHAT IS THE ETHICS CHANNEL?

MEDICHEM's Ethics Channel consists of an external platform accessible at the following link:

<https://medichem.integrityline.com>

IV. ESSENTIAL PRINCIPLES AND GUARANTEES FOR THE USE AND MANAGEMENT OF THE ETHICS CHANNEL

- **Guarantee of confidentiality:** MEDICHEM guarantees that (i) the identity of the persons sending a report; (ii) the identity of any other person concerned or mentioned in the report; and (iii) the actions taken, will be kept confidential and will not be disclosed or communicated to unauthorised persons.
- **Anonymity:** Reports may be submitted anonymously, i.e. without needing to identify oneself.
- **Prohibition of reprisals:** MEDICHEM will not adopt any kind of reprisal or negative action against persons who submit a report in good faith.
- **Diligently and impartially managing the report:** The report will be handled according to the requirements stipulated in Act 2/2023, in an objective manner and avoiding any possible situations of conflict of interest.
- **The right to provide the report by means of a face-to-face meeting with the person responsible for the Ethics Channel:** This must take place within a maximum term of seven (7) calendar days

counted from the date of your request. The face-to-face meeting will in all cases be documented (i) by recording the conversation or (ii) by a complete and accurate transcript of the conversation. It will be possible to listen to the recording and/or check, rectify and accept the transcript of the conversation by signing it.

- **The right to contact independent authorities (external channel)** through the mechanisms they have in place.
- **Personal data protection rights**, pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, Act 3 of 5 December 2018 on the protection of personal data and guarantee of digital rights and Act 2 of 20 February 2023 on regulating the protection of persons who report regulatory infringements and prevention of corruption.
- **Other rights** set out in Act 2 of 20 February 2023 on regulating the protection of persons who report regulatory infringements and prevention of corruption.

V. GUIDE FOR USING THE ETHICS CHANNEL

Apart from the guarantees and rights explained in the previous section, it is important to highlight the following points regarding the use of the Ethics Channel:

- The Ethics Channel is managed by the person responsible for it. At MEDICHEM, such person is a member of the Ethics and Compliance Committee. The person responsible for the Ethics Channel at MEDICHEM is currently the **Head of the Legal Department**.
- Reports received through the Ethics Channel will be accessible to: (i) the person responsible for the Ethics Channel and other persons in charge of its management; (ii) the Manager of the Human Resources Department; (iii) when appropriate, the data processors, e.g. internal or external consultants or managers; and (iv) when appropriate, the Data Protection Officer.
- The Ethics Channel can only be used to report facts or submit queries as mentioned above (see point “What can be reported through the Ethics Channel?”).
- Misusing the Ethics Channel may result in penalties being imposed. For example, in the case of false reports or those in bad faith.
- All MEDICHEM’s collaborators must report any infringements of the compliance system or applicable legislation that they become aware of.

VI. PERSONAL DATA PROTECTION RIGHTS

DATA CONTROLLER

- Identity: MEDICHEM, S.A.
- Registered office: C/ Fructuós Gelabert, 6-8 - 08970 Sant Joan Despí, Barcelona (Spain).
- Tax Identification Code (CIF): A08287104.
- Tel: +34 934 776 440.

PURPOSE OF THE PROCESSING

The personal data provided in the report will be processed for the purpose of handling and analysing such report, investigating the reported facts and taking the relevant corrective disciplinary or contractual measures in order to comply with MEDICHEM's due diligence and supervision.

CATEGORIES OF PERSONAL DATA

The personal data that MEDICHEM will process are those provided by the whistleblower through the report, as well as any other data that may be collected as a result of the investigation that could be launched according to the specified procedure for MEDICHEM's Ethics Channel.

ANONYMOUS AND CONFIDENTIAL

Whistleblowers may identify themselves but may also report any fact anonymously. In either case, both the personal data and the information will be processed confidentially.

Although the identification of the whistleblowers is not mandatory and they may choose not to provide their identification or contact details, these may contribute to the successful outcome of the investigation. Whistleblowers may also identify themselves after submitting the report or provide additional documents or information at a later stage in the process.

Any actions by witnesses and persons concerned will be kept strictly confidential.

LEGAL BASIS

The legal basis of the data processing by MEDICHEM is the public interest (Article 6.1.e of the GDPR) and compliance with a legal obligation (Article 6.1.c of the GDPR).

STORAGE

The data will be stored for the time required in order to decide whether to launch an investigation into the reported facts and, when appropriate, for the additional period required to comply with applicable legal or internal regulations.

The data of the person sending the report and of all the parties involved will only be stored in the Ethics Channel for the time required to decide whether to launch an investigation into the facts reported, which will never exceed three (3) months counted from the time the report is submitted. Once this maximum period has elapsed, the data will be erased from the Ethics Channel, notwithstanding the storage and processing of such data that may continue to be carried out by the investigation team in order to conduct the investigation.

After erasure, the data will be blocked for the legally stipulated periods.

DATA DISCLOSURE

- a) To authorities that may be involved in the investigation or possible legal proceedings.
- b) To persons who may be involved in the investigation *per se*.
- c) State security forces and bodies and the competent courts.
- d) Third parties that MEDICHEM may use as support in order to manage the Ethics Channel, e.g.: data hosting platform, tool supporting the Ethics Channel, persons to whom the investigation can be specifically assigned, lawyers or other advisors, among others.

EXERCISE OF RIGHTS

a) Rights of the whistleblower: The whistleblowers may exercise their rights at any time to access, rectify, erase, object to and restrict the personal data they have provided and to the portability thereof, (their own personal data, but not those of other possible participants or those involved in the investigation), by sending a letter to the specified address or to the following e-mail address: dataprotection@medichem.es identifying themselves as a user of the Ethics Channel service, within the limits stipulated in the applicable regulations.

b) Rights of the person involved in the reported facts: The right to be informed as soon as possible that he/she is the subject of investigation, as a result of a report concerning him/her or his/her actions. The aforementioned report must contain at least the following: the body responsible for the management, the facts reported, the rights to which he/she is entitled and the procedure for processing the report, as well as all the information relating to the data processing provided in the previous paragraph. The right to access the data recorded, except for the identity of the whistleblower and the personal data of other persons involved in the case and the right to rectify any personal data that are inaccurate or incomplete. Such person is also entitled to be informed of the decision or closure of the report, if applicable. If informing the person involved in the reported facts that he/she has been the subject of a report could jeopardise MEDICHEM being able to investigate or obtain evidence effectively because of the risk of destruction or alteration of evidence by the person concerned by the report, MEDICHEM may delay such duty of information.

The person concerned by the facts reported may exercise other rights included in data protection regulations: erasure (in accordance with the terms for the storage of personal data stipulated in current legislation), restriction and portability with respect to their personal data by sending a letter to the specified address or to the following email address: dataprotection@medichem.es being identified as the person involved in an internal investigation, providing this is compatible with the aforementioned investigation being successfully conducted.

In the event that they consider their right to data protection has been infringed, any of them may submit a complaint to the Spanish Data Protection Agency (www.aepd.es).

