

SUPPLIER CODE OF CONDUCT

Introduction

This Supplier Code of Conduct (hereinafter, the "**Code**") reflects the commitment of Noucor Group, S.L. and its subsidiaries (hereinafter, "**Noucor**") to business ethics and transparency, establishing the ethical principles and values that will govern the activity of suppliers of goods and services, contractors and third-party collaborators (hereinafter, the "**Suppliers**")

The ethical principles and values set out herein are mandatory for Noucor's Suppliers. However, its application will be proportional to the size, organization, nature, scale and complexity of the activities carried out by the Suppliers. This means that these principles and values will be adjusted and aligned with the principle of proportionality.

This Code is understood as an extension of Noucor's Code of Ethics, reaffirming its commitment to its principles of ethics, integrity, legality and transparency, as well as its zero-tolerance policy towards any form of illicit behaviour. It reflects a commitment to ethical conduct and professional behaviour.

Scope of application

- Corporate scope: This Code applies to all companies of the Noucor Group: Noucor Group S.L. and its subsidiaries Noucor Health, S.A., Urquima, S.A., and Palau Pharma, S.L.
- Relational scope: The scope of application of this Code shall extend to all our Suppliers. In cases where, pursuant to the principle of proportionality, full implementation of all principles is not feasible, contracting shall be limited to companies whose internal policies are reasonably aligned with ours, taking into account their size, resources, and operational scope.
- Geographical scope: This Code applies to all activities carried out by Noucor, wether local or international

1. Ethics

Business integrity. Fighting Bribery and Corruption

Noucor maintains a zero-tolerance policy towards corruption, bribery, extortion and embezzlement. In this regard, its Suppliers must conduct their business activities fairly and will not accept or offer bribes or legal incentives, nor will they give or accept gifts or invitations that may unduly influence their employees or stakeholders, always acting within the law. In addition, Suppliers must take an active stance against any unlawful acts, respecting applicable laws and ethical standards.

Fair competition

Suppliers must operate consistently and fairly, respecting all applicable antitrust laws. It is essential that Suppliers conduct their business practices in a transparent and truthful manner and must refrain from any practices that violate such regulations.

Suppliers have a duty to ensure that any third party involved in their operations complies with competition laws.

Intellectual property, confidentiality and privacy

Noucor's intellectual property and confidential information are key assets that must be properly safeguarded by Suppliers. They are expected to use this information responsibly and to sign confidentiality agreements that ensure adequate protection. Suppliers must also respect and uphold all of Noucor's intellectual property rights.

In addition, Suppliers are required to comply with applicable data protection and information security laws. This includes, among other responsibilities, putting in place appropriate measures for the collection, storage, processing, transmission, and transfer of personal data, ensuring it is handled securely and with strict confidentiality.

Product Quality

Suppliers must ensure that the materials and products supplied, manufactured, packaged, stored and/or distributed on behalf of Noucor comply with the quality regulations and good manufacturing and laboratory practices required in the relevant markets.

Animal welfare

Noucor is committed to the welfare and respectful treatment of animals. Accordingly, it is essential that Suppliers comply with all applicable regulations and conduct animal testing only when strictly necessary, minimizing the number of animals used and applying the most humane and scientifically validated methods. Wherever possible, alternative methods should be employed.

2. Working conditions and human rights

Freedom of employment

Suppliers must not engage in the use of prison labor, forced labor, bonded labor, indentured labor, or any other form of involuntary labor. Furthermore, they shall respect the right to freedom of association and the right to collective bargaining, in accordance with the applicable laws of the country in which they operate.

Child labour

Child labor is strictly prohibited under ILO Convention No. 138, which sets the minimum age for employment at 15 (or 14 in certain developing countries). Where the local legislation of the country in which the Supplier operates establishes a higher minimum age, such higher age shall prevail. In addition, any work performed by individuals under the age of 18 must comply with the minimum employment conditions established by applicable regulations and must not endanger their health, safety, or moral development.

For Noucor, child labor is unacceptable; therefore, Suppliers must ensure that no form of child labor is used under any circumstances.

Dignity and respect

It is critical to Noucor that Suppliers treat all their employees and any stakeholders with dignity and respect, ensuring an environment free from intimidation, harassment and abuse. Discrimination based on nationality, race, ethnicity, religion, political affiliation, marital status, social status, age, disability, culture, sex, gender identity, sexual orientation, or any other status protected by law will not be tolerated. In addition, it is imperative that Suppliers provide a workplace free of discrimination and promote equality.

Working hours and wages

Suppliers must respect the labor rights of their employees, complying with the national laws that are applicable to them, ensuring, among other things, that the working time of their employees does not exceed the maximum established by national legislation and ILO standards. In addition, the right to rest and leisure of its employees must be respected at all times, facilitating the reconciliation of work and private life.

Likewise, compensation must be paid regularly, on time, and in full, so that both remuneration and benefits are fair and competitive, always in accordance with applicable national laws.

Social security

Where required by national legislation, Suppliers must comply with social security regulations, ensuring the timely and accurate payment of all applicable contributions.

3. Health and safety

Protection and safety at work

Suppliers must comply with occupational health and safety regulations, ensuring a safe environment for all employees. This includes providing adequate protective equipment and protecting against exposure to chemical, biological, and physical hazards. In addition, they must ensure working conditions that prevent excessive fatigue and maintain a balance between working hours and breaks.

Emergency Management

Suppliers will conduct risk analysis and provide their employees with the necessary training and guidance to promote a safe working environment. In this regard, Suppliers must minimize risks by implementing appropriate emergency plans and equipment.

4. Climate and environment

Environmental Compliance

Noucor seeks to promote the conservation of natural resources among its Suppliers. To this end, Suppliers must comply at all times with applicable environmental laws, regulations, and codes. They are required to obtain and maintain all necessary environmental permits, licenses, and registrations, including chemical registrations. Furthermore, Suppliers must strictly adhere to the operational and reporting requirements associated with such authorizations, ensuring full compliance with all related obligations.

Within this framework, Noucor incorporates the DNSH ("*Do No Significant Harm*") principle, as established under the European Union Taxonomy Regulation. This principle asserts that no economic activity should result in significant harm to the environment. Accordingly, Suppliers are expected to adopt responsible practices that prevent material negative impacts on natural resources, biodiversity, climate, and human health.

This includes, among other actions, the efficient use of energy and water, the prevention of pollution, the reduction of waste and emissions, and the integration of environmental criteria into their production processes and supply chains.

Waste and emissions

For Noucor it is essential that Suppliers comply at all times with applicable environmental regulations and that they follow the corresponding operational requirements. In addition, Suppliers must establish robust systems to ensure the correct handling, transport, storage, recycling, reuse and management of waste, atmospheric emissions and wastewater discharges. It is essential that any waste,

emission or wastewater that may have adverse effects on human health or the environment is properly managed, controlled and treated prior to release.

Greenhouse Gas Emissions

Suppliers must establish monitoring and reporting systems to ensure transparency and continuous improvement in the management of their emissions.

5. Management System

Commitment and responsibility

Suppliers shall comply with the standards set forth in this Code and allocate the necessary resources to ensure their effective implementation. In addition, they must demonstrate their commitment to the principles outlined herein through the appropriate allocation of resources.

Communication to subcontractors

Suppliers shall inform all subcontractors involved in the provision of services of the content and requirements of this Code, ensuring its principles are understood and upheld throughout the supply chain.

Transparency

In the event of any breach of this Code, Suppliers shall immediately notify Noucor and ensure transparency in the supply chain.

Documentation

Suppliers must retain the documentation required to monitor and evidence compliance with the standards set forth in this Code, as well as to demonstrate compliance with applicable laws, regulations and expectations.

Approval and modification

This Code was approved by the Noucor Compliance Committee on July 3, 2025.

Any modification of this Code shall be subject to approval by the Compliance Committee, and any of the members of the Compliance Committee may propose modifications to it.

Version	Modifications	Date
Version 1	Document creation and approval	July 03, 2025