

Code of conduct



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Making it personal

At Attindas, personal care is not just how we describe our business. It's our mission. It's personal. It's a child, a loved one, it's often about those that can't help themselves. Caring for them can only be personal. So personal care isn't just our category; it's our calling, our purpose. We imagine the solutions that make caring for babies' skin, and preserving dignity and independence easier, more affordable, for everyone. At Attindas, we believe everyone deserves personal care.

Attindas Hygiene Partners. Making it Personal.



A message from our CEO



*Michael Earl Fagan
Attindas Hygiene Partners
President and CEO*

Dear friends,

As a global leader in absorbent hygiene solutions, we are experts in understanding and serving people's real needs. We are a reliable and sustainable partner for our consumers, our customers, and for all our stakeholders. But it's our unique roots across the varied markets we serve, our people, the way we move forward together, and our ability to create the best combination of local intimacy and global strength that make us truly different and special.

We champion health, dignity and comfort, every day, for millions, through what we make and how we work. We strive to be the best at combining global scale and local intimacy to make absorbent hygiene effective, affordable and widely available. At the very heart of our success is our commitment to being genuine, personal and unique.



Our Board of Directors and the members of our Global Leadership Team have as a preeminent goal the fostering of a strong organizational culture of institutional and individual integrity, compliance, accountability, and ethics, based on vision, mission and values embraced by all.

Our company is, now more than ever before, being observed by many. Accordingly, it is important that we have a common way of dealing with myriads of issues that arise around the world in order to ensure that our behavior is beyond reproach. We cannot emphasize enough the importance of this last point. Every day, what we do and what we say shapes Attindas's reputation and impacts our common future.

Our Code of Conduct is aimed at setting the parameters to comply with laws and regulations in all the countries where we conduct business and guide our actions. In many instances, Attindas, as a responsible corporate citizen, has adopted policies and best practices that go beyond what the law requires.

We always look to the future beyond the horizon. We're never satisfied with things as they are; we always want to make them better, and we work together to make that happen. We bring our resourcefulness and creativity to bear for long-term success. We relish challenges of all kinds, whether they come from our clients or from within, and never rest until we've solved them.

As a world-class industry leader, we deliver the highest value to our customers, empower our employees and directors (our People) to be the best, contribute to the well-being of our communities, and are committed to the highest standards of ethics and business conduct. We comply with all applicable laws, regulations and rules affecting our business and our conduct in business matters that are applicable regardless of the location. Cultural differences or social customs are not an excuse for illegal action. Our People are expected at all times to act honestly and maintain the highest standards of ethics and business conduct, consistent with our good reputation as a well-respected corporate citizen.

We believe that the way we do our business is as important as the business that we do. Understanding and practicing the ethical standards outlined in our Code of Conduct is one of the foundations of our success as an organization and as individual contributors. As our Code of Conduct is an expression of our core values and a framework for decision making, each of us has the duty to read, understand and abide by it.



Michael Faye

Your role

Our Code of Conduct is a valuable guide to ethical issues that may arise from time to time in our contacts with fellow directors and employees, customers, suppliers, competitors and the general public. Make sure that you understand your responsibilities under the Code and think about how it applies to you and to your work. Our Code cannot and is not intended to cover every applicable law, rule or regulation wherever we conduct business around the world, or to provide answers to all questions that may arise. Common sense and good judgment, and doing the “right thing”, must govern all our actions.

In the course of your daily work, you may face difficult situations. If you are in doubt about any of your actions, simply ask yourself the following questions: Is it legal, ethical or consistent with our Code? Are you willing to stand up for our behavior publicly, such as by having your actions featured on the front page of your local newspaper or church bulletin?

If the answer to any of these questions is “no”, or you think your actions may harm our brands or reputation, do not take questionable actions. Whenever you are uncertain, always be transparent and ask your manager for guidance. We strive to have an open culture of inclusiveness. All of us are encouraged and should feel empowered to come forward to discuss ideas, improvements, different views and, in good faith, also raise concerns we might have. In order to sustain an open culture of inclusiveness and honesty, our way is to be transparent and discuss or report to your supervisor, one of our nearest managers, or, if needed, any higher level manager, so that any matter can be dealt with in a straightforward way.

“Everybody else is doing it” is never a reason to do something illegal, unethical or inconsistent with the values in our Code.



Your responsibilities

Our Code of Conduct is for you. It sets the boundaries within which you must operate every day, without exception. Read it. Understand it. Follow it.



Remember always to:



- *Seek advice when things are not clear.*
- *Understand the risks in your role and how to manage them.*
- *Promptly complete the Ethics and Compliance training assigned to you.*
- *Make sure that any third party contractors, agents or consultants you work with are aware that we are bound by our Code and that they should act accordingly.*
- *Speak up. It is your duty to report any suspected violations of the Code and cooperate with the investigation of potential violations.*
- *Lead by example. Communicate and demonstrate the content as well as the spirit of our Code to our People. Make sure that the team you lead understand their responsibilities under our Code.*

WE KEEP IT GENUINE

WE KEEP IT PERSONAL

WE KEEP IT UNIQUE

How we do it

All that we make, and how we behave and operate is real, sincere, honest, authentic. We pursue our business objectives with integrity and in compliance with the law. You are expected to recognize the importance of making ethically sound business decisions and behaving in ways that support our core values. Everyone may be confronted at some time with pressures, temptations and ethical dilemmas in the workplace. Handling them with integrity and recognizing when to seek advice will define your personal contribution to our business and earn you the respect of our People and partners.

Our work begins and ends with the people who make and use our products and includes the partners that we serve and help us along the way. Our work is a smile tailor-made for them. We look out for each other's safety as well as our own. We treat each other, our communities, and the planet with respect as the way to guarantee a sustainable future for our business. Our products care for our consumers, and we care deeply for our stakeholders—we invest ourselves fully in their outcomes.

We take pride in delivering differentiated solutions. And we deliver them to the market in a way that's uniquely our own through our creativity and inventiveness. We also respect the value in people's uniqueness and safeguard their personal information.



WE KEEP IT GENUINE

Antibribery

We Do Not Tolerate Bribery or Corruption

Trust, respect, integrity and honesty are essential to us. Any type of corruption is contradictory to the objective of doing good business. We have zero tolerance towards bribery or corruption in any form.

Gifts and Entertainment

You must not offer or accept gifts, benefits, reimbursements to or from a third party that would constitute a violation of this Code or relevant laws. Cash payment gifts and others like personal loans or guarantees of such obligations, whether of large or small amounts, could be regarded as bribes and

may not be accepted under any circumstances. Offers of this nature must be politely, but firmly declined or immediately returned to the sender if delivered without prior notice and to be reported to your manager.

This also applies to any situation that could affect, or appear to affect, your professional judgment in the performance of your work or duties.

However, we recognize that the acceptance of small advertising or promotional items, with no commercial value as well as modest

Bribery is offering, promising, giving, or accepting anything of value or other advantage to induce the recipient or any other person to act improperly in the performance of their functions or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage in order to assist in obtaining or retaining business. Corruption is the intent or desire to wrongfully influence a person with entrusted power or position for private gain.



WE KEEP IT GENUINE

hospitality and events may be a legitimate contribution to building good business relationship. If you are in doubt, always ask your manager.

Bribes, kickbacks and similar inducements:

We must not, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback, unauthorised loan or any other unlawful or unethical benefit when conducting business for Attindas.

Business meals and entertainment

The giving and receiving of reasonable and customary meals in the normal course of

business is permitted. Lavish meals and inappropriate entertainment must be firmly but politely declined. Taking care of the guest is the main theme here, and we show our respect, humility and cost consciousness to our business partner.

Charitable Contributions

Charitable Contributions of our funds must only be made with a pro bono purpose and must not be linked directly, or indirectly, to the past or future supply or acquisition of our products.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Antibribery Policies*
- *Attindas Antikickback Compliance Policy (US)*

For more information please contact:

- *Law Department*
- *Compliance Officer*

WE KEEP IT GENUINE

Fair and open competition

We believe in Fair Competition

Our success depends on building productive relationships based on honesty, integrity, ethical behavior and mutual trust. You must deal fairly with our People and with each of our Customers, Suppliers and other business partners. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.

We believe in Free and Open Competition

In all of the countries where we do business, strict laws are in force prohibiting collusive or

unfair business behavior that restricts free competition. You must not enter into agreements with competitors to fix prices, terms of sale or production output and should never exchange such information about a customer with anyone. Also, attempts to discriminate in prices or terms of sale between Customers, or to restrict the freedom of our Customers to compete, can sometimes be illegal. Legal issues can also arise from refusal to deal with Customers. Failure to strictly adhere to competition laws may result in significant penalties to us and to you.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Antitrust Policies*
- *Attindas Antitrust Quick Reference Guide*
- *Attindas Competitors Contact and Communications Guide*

For more information please contact:

- *Law Department*
- *Compliance Officer*

WE KEEP IT GENUINE

Avoiding conflicts of interest

We avoid conflicts of interests

You must take business decisions and actions in our best interests. Accordingly, placing yourself in a conflict of interest is strictly prohibited. A conflict of interest occurs when your individual personal interest interferes in any way - or even appears to interfere - with our interests. A conflict situation can arise when you (or a member of your family) takes actions or have interests that may affect your ability to perform your duties for us objectively and effectively.

Conflicts of interest will also arise when you (or a member of your family) receives

inappropriate personal benefits as a result of your position in our company. Such conflicts of interest can undermine the business judgment and responsibility to us and threaten our business and reputation.

All apparent, potential, and actual conflicts of interest must be rigorously avoided.

Even the appearance of a conflict can tarnish our reputation - as well as yours. The golden rule when dealing with any conflict or even potential conflict is full disclosure of all the facts. That allows everything to be properly examined. You must always disclose to your

the following are examples of conflicts of interests: a member of your family is employed by a supplier or a vendor or you hold any position, involvement or a financial stake in any organization that is a competitor, customer, supplier or any other business partner of our company, if your position allows you to influence the business relationship.



supervisor if there is a potential conflict of interests which might influence or appear to influence your judgment and actions.



For more information please contact:

- *Law Department*
- *Compliance Officer*

WE KEEP IT GENUINE

International trade compliance

We comply with International Trade Bans and Restrictions

As a global company doing business around the world, we are responsible for knowing and complying with laws that restrict international trade. International trade laws are complex and change frequently, and penalties for violations can be severe, including fines, revocation of permits and imprisonment. If you are involved in the sale, marketing, distribution or transportation of products or materials, or provision of services, across international borders you must comply with applicable laws, the provisions of our Code and our policies related to international trade restrictions.

Export Controls

Our operations worldwide must be in compliance with all applicable United States, European Union or other local export control laws. Many countries have laws restricting the export of goods and technology, and other dealings with certain states, entities and individuals. The United States, the European Union and other countries have controls which restrict the export of certain products, services, technical data and software to other countries, as well as the re-export of those items from one destination to another.



WE KEEP IT GENUINE

Import Controls

We must not import or otherwise deal with products or commodities originating from a country subject to United States, European Union or other local government trade sanctions. If you are involved in the importation of products or commodities you must ensure that all import documentation is accurate and complies with applicable laws and regulations. Where it is your responsibility to do so, you must ensure that items being imported are correctly described and valued.

Economic Sanctions and Embargoes

The United States Department of the Treasury's Office of Foreign Assets Control ("OFAC") administers economic sanctions and trade embargoes against targeted non-United States countries and regimes, terrorism-sponsoring organizations, international narcotics traffickers, and others in order to protect United States' national



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Export Compliance Policy*

For more information please contact:

- *Law Department*
- *Compliance Officer*

security, foreign policy or economic interests. All United States persons and corporations must comply with OFAC regulations and there are significant civil and criminal penalties for violations. Similar Sanctions or Embargoes may have been approved by the European Union or other local jurisdictions and you must comply with them.

Boycotts

We will not participate in boycotts of countries, their nationals or blacklisted companies, unless these boycotts are sanctioned by the United States government and our participation is approved by the Law Department. You must refer immediately to the Law Department any requests from Customers, Suppliers or others to participate in a boycott, or any inquiry about our position on a particular boycott.

WE KEEP IT GENUINE

Respect of human rights

We Respect Human Rights

Respect for Human Rights is one of our fundamental values. Through our actions and policies, we strive to respect and promote Human Rights in our relationships with our People and our business partners. Our aim is to help increase the enjoyment of Human Rights within the communities where we operate. We expect our People and our business partners to avoid causing or contributing to Human Rights infringements through their business actions.



Remember. We do not tolerate:

- Use forced labor or involuntary prison labor in any form, including any human trafficking and slavery.
- Employ underage employees as defined by applicable child labor laws.



We do:

- Comply with applicable minimum wage, overtime and maximum hour laws, as well as other wage and hour regulations.
- Comply with applicable laws related to an employee's choice to join, or not join, any legally sanctioned organization or association.



Applicable Policies available on Attindas Sharepoint site:

- Attindas Human Rights Policy
- Attindas California Transparency Statement

For more information please contact:

- Law Department
- HR Department
- Compliance Officer

WE KEEP IT GENUINE

Sustainability

We Care for our planet

We are committed to ensuring that our business practices are responsible and transparent. We work systematically to reduce our negative impacts and to enhance our positive impacts on the society and the environment, and we take action through our business and in partnerships to be part of the solution to global sustainable development challenges

We favor the use of renewable raw materials and the development of environmentally friendly packaging.

We support the United Nations Sustainability Development Goals.

Many of the activities involved in bringing our products to market have a direct impact on the environment. It is everyone's responsibility to seek to reduce that impact wherever possible. Every small step counts.



You must consider how our behavior in all aspects of our work impacts on the environment, so that we can reduce that impact wherever possible: you can, for example, contribute by cutting out unnecessary travel, saving water and energy and avoiding generating waste. Where waste is unavoidable, you must ensure materials are recycled or disposed of in a responsible fashion. Even small gestures, such as separating food waste in the company eating areas, can make a difference



Applicable Policies available on Attindas Sharepoint site:

- Attindas Health, Safety and Environmental Policy

For more information please contact:

- HSE Department
- ESG Committee

WE KEEP IT PERSONAL

With our employees

Our People make it personal, every day, inside our company and out.

Diversity and non-discrimination

We respect the dignity, rights and aspirations of our People without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, veteran status or any other characteristic protected by law. This applies to all aspects of employment. We are committed to providing an equal opportunity

Teamwork is encouraged and successes, as well as failures, should be shared. We should all aim to give credit to other people's ideas, and recognize the contributions of others. We should listen with generosity and share information as needed, subject to Attindas' rules on confidentiality.



work environment that is diverse and free from discrimination and harassment. Each of us has the right to respect and human dignity. That principle is fundamental to the way we work. Any behavior or action likely to infringe this right, and in particular any form of harassment or bullying, is not acceptable.

Lack of respect, through abusive speech or inappropriate gestures or racist, discriminatory or sexual remarks or behavior, is unacceptable. Disparagement of colleagues is also contrary to our values. In this way, we will maintain a culture of loyalty, trust, solidarity and respect for cultural differences throughout our business.

The diversity of individual talents in our workforce strengthens our creativity, and allows us to develop and market relevant products. Attindas is an inclusive, equal opportunity employer. We facilitate the professional integration of people who are

WE KEEP IT PERSONAL

under-represented in the workforce, in particular people with disabilities and under-represented social and/or ethnic groups.

Professional development

We communicate our goals and strategies to our People so they are committed to and enthusiastic about our vision. We support our People's personal and professional development, we encourage our People to get involved in improving their own skills and knowledge. Our selection, recruitment, training and internal promotion policies are based on clear criteria relating to skills, competencies and merit. We keep our People informed on how we evaluate their contribution at work. We expect

them to actively take part in the evaluation process so they can keep improving their performance.

Remuneration

We reward our People fairly, in line with the labor markets where we work.



WE KEEP IT PERSONAL

Occupational Health and Safety

Each of us have a right to a healthy, safe and secure working environment and safety at work depends on all of us. This is why the health and safety of our People is a top priority for us. We are continuously striving to ensure safe working conditions, equipment and work sites. We foster management and People involvement and accountability in identifying, preventing and eliminating hazardous conditions and the risks of injury.

Health and safety in the working environment, product quality and operating efficiency are inseparable. We ensure continuous improvement in health and safety performance through close cooperation among management, employees and unions, with the aim of contributing to the health and safety of our People and the success of the organization.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Antidiscrimination and antiharassment Policy (US) and other local antidiscrimination policies*
- *Attindas Equity Policy (US) and other local equity policies*
- *Attindas Health, Safety and Environmental Policy*

For more information please contact:

- *HR Department*
- *HSE Department*

You must:

- Take every reasonable precaution to maintain a safe and healthy working environment
- Ensure you are not putting yourself or others at risk by your actions
- Ensure that you know what to do if an emergency occurs at our workplace

WE KEEP IT PERSONAL

With our customers

Making it personal can only happen by knowing our Customers deeply and personally

Serving our Customers around the world and building strong Customer relationships are among our highest priorities. We continuously strive to deliver high quality products that meet or exceed our Customers' needs and expectations in a manner that does not compromise our ethical and legal obligations.

Product Quality

It is our responsibility to understand and satisfy our customers' requirements with quality products while always maintaining high ethical standards and fully complying with laws and regulations. We must ensure that our products are designed, manufactured and

distributed to meet our obligations to customers and in accordance with applicable laws.

Communication and advertising

We are honest with our Customers, always providing them with truthful, clear, practical and precise information when marketing our products. We make sure those products comply with all the required and advertised specifications. We provide all the information needed to satisfy our Customers if they are unhappy with our products and services and honor all applicable warranties that are the subject of valid claims.





WE KEEP IT PERSONAL

With healthcare professionals

We make it Personal with Healthcare Professionals

We interact with Healthcare Professionals in many ways, including through research and development, market access, educational and promotional activities. We act with independence, integrity and transparency in every aspect of our relationships with Healthcare Professionals



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Antibribery Policy*
- *Local Association Industry Standards*

For more information please contact:

- *Law Department*

WE KEEP IT PERSONAL

With our suppliers

Making it personal can only happen by knowing our Suppliers deeply and personally

Our success is rooted in our commitment to high quality products supported by strong Supplier relationships. We foster Supplier relationships based on trust, fairness and mutual respect. We hold our Suppliers, their employees and subcontractors to the same high standards of business integrity to which we hold ourselves.

Fair and Transparent Dealings with Suppliers

Our relationship with our Suppliers (including Service Providers) extends beyond the purchase and delivery of goods and services.

Remember. We will not abuse our market position in order to gain preferential treatment and will not provide a Supplier with confidential business information (proposed rates, winning bid information, etc.) of any other Supplier. We must pay Suppliers on time and according to the agreed terms, unless there are legitimate reasons for not doing so, such as merchandise ordered not being delivered.



It is integral to the long-term success of our business. We will be judged by the quality of the relationship we have with our Suppliers.

In particular, we will be scrutinized on how we select our Suppliers, and how they demonstrate their commitment to doing business responsibly and how, when circumstances dictate, we terminate any such relationships.

We are proud of our reputation for dealing with Suppliers in a mutually supportive and open way. These relationships are based on the principles of impartiality, fairness and

loyalty and we respect their independence and identity. We communicate honestly and openly with Suppliers, seeking to understand problems when they arise and working collaboratively to find mutually satisfactory solutions. If your job involves working with Suppliers, you must treat them with integrity and professionalism and observe applicable procurement standards and laws.

Selection of Suppliers and Service Providers

You must carefully select Suppliers based on objective criteria. When purchasing products and services, you must involve and follow the appropriate purchasing procedures as laid

WE KEEP IT PERSONAL

If your job involves selecting or working with Suppliers, help them understand our ethics and compliance requirements. Be alert to and report to your manager any conduct of a Supplier, its employees or subcontractors that appears to be inconsistent with the standards of our Code.



down in our applicable procurement guidelines.

Business Conduct Standards for Suppliers

We are committed to sourcing responsibly and ensuring that our Suppliers conduct their operations in a socially responsible manner. Transparency and sustainability are critical elements to our Supply Chain. We expect our Suppliers to follow the standards of our Code, or otherwise act in a manner consistent with our standards. We must ensure that our ethical expectations are understood and respected by all Suppliers wherever they operate.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas California Transparency in Supply Chains Statement*
- *Attindas Antibribery Policy*

For more information please contact:

- *Law Department*
- *Compliance Officer*

WE KEEP IT PERSONAL

With our product users

Our consumers are our priority

Countless people come into contact with our products and services on a daily basis. We bear a responsibility for minimizing, to the extent possible, any risks, detrimental effects and hazards to the health, safety, environment and assets of our consumers or any third party arising from the handling and use of these products and services.

For that reason, it is not only our statutory duty but also our mission to comply with the laws and regulations as well as the internal standards that apply to our products. This is monitored continually and systematically

through processes and structures, as well as through product surveillance under real field conditions. We make no compromises on that.

Product safety and quality has always been paramount at all times. It is the superior performance, quality and safety of our products that demonstrate our dedication and respect for our consumers, that maintain their trust, underpin the reputation of our brands and ensure that we remain a leader in our field.

We are committed to marketing products that



WE KEEP IT PERSONAL

have proven efficacy and safety, which undergo rigorous evaluation methods. All our People involved in product development, manufacturing, marketing and sales must seek to achieve total product quality, from its conception to its distribution, even after it has been put on the market. We must ensure that the highest standards of hygiene and strict quality controls are applied at each stage, from product development to manufacturing and distribution process.

We must ensure that all advertising and promotional material is adequately substantiated in accordance with our company procedures and the industry's best practices.



Applicable Policies available on Attindas Sharepoint site:

- *Local Quality Policies and Procedures which support our Quality Certifications and compliance with Regulatory requirements*
- *Attindas Claim Approval Procedure*

For more information please contact:

- *Quality and Regulatory Department*

WE KEEP IT PERSONAL

With our communities (physical and virtual)

We respect all stakeholders in our professional sphere, including competitors
We treat them the way we would like them to treat us.

We Support our Communities
We respect, learn from and support the communities and cultures which we work. We understand the impact our business may have on communities and take advantage of the community outreach opportunities that we are involved in to make a personal impact.

We Communicate Responsibly
Use social media wisely. If our company

We are a responsible stakeholder in society, a good neighbor and a concerned citizen committed to the communities in which we do business. We encourage employees to play an active role in their communities.



The success of our products is based on their intrinsic characteristics and performance. This principle is essential to winning and keeping consumer and customer trust and loyalty. We must communicate responsibly: Follow internal validation procedures for advertising and claims even if it delays a product launch.



WE KEEP IT PERSONAL

comes up while you are in social media, make it clear in your postings that you are an employee, and your views are your own -you are not speaking for the company. Do not disclose confidential information. This includes information about our business partners or our customers, and be careful to not post anything that might be unlawful or constitute a threat, intimidation, harassment or bullying.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Community Investment Policy*

For more information please contact:

- *Law Department*
- *HR Department*



WE KEEP IT UNIQUE

Protect and respect intellectual property

Confidential business information includes all nonpublic information that, if disclosed, might be of use to our competitors or harmful to Attindas, its customers or suppliers.



We protect our business information

You must preserve the confidentiality of such information (whether or not it is considered proprietary) entrusted to us not only by our company, but also by our People and business partners.

Information is valuable. The unauthorized disclosure of internal information can lead to a loss in value and be detrimental to our company. You must ensure the protection of internal information, strictly following our rules and procedures on this subject.

Those of us who have access to confidential information belonging to business partners are under a similar obligation to protect it from disclosure.

You must:

- Limit disclosure of internal information to people with a legitimate “need to know” that serves our company’s interests
- Avoid discussing confidential information in public areas
- Keep up to date of our rules and procedures on information management
- Ensure the safe keeping of all confidential employee, consumer, customer and supplier records, both paper and electronic
- Before sharing internal information with third parties (including namely members of your family or when using social media), check what you have the right to communicate

WE KEEP IT UNIQUE

The obligation to preserve confidential information is ongoing, even after the end of service for our company.

Protection and proper use of Assets

Proper and efficient use of our company, Supplier, Customer and other third-party assets, such as information (proprietary or otherwise), materials, facilities and equipment, as well as intangible assets, is everyone's responsibility. You must not use such assets for personal benefit for yourself or others. In addition, you must act in a manner that protects such assets from loss, damage, misuse, theft, removal and waste, and that ensures that such assets are used only for legitimate business purposes.

Information Security

We manage our Information Assets and Information Technology (IT Assets) with due diligence and take appropriate measures to safeguard these assets to ensure continued delivery of services and products.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Global Information Security Policy*
- *Attindas IT Acceptable Use Policy*

For more information please contact:

- *IT Department*
- *Law Department*

You must:

- Protect our IT Assets against unauthorized access, modification, disclosure or loss, in a consistent and reliable manner.
- Use our IT Assets in a manner consistent with your job requirements and description, conducting your business activities with diligence, and to adhere to our IT Assets protection policies.

WE KEEP IT UNIQUE

Protect personal data

We care for Privacy

We respect the right to privacy of individuals which must be balanced by our legitimate interests to safeguard our systems, infrastructure and values. We reserve the right to monitor uses of all devices that are connected to our network to prevent any loss of confidentiality, integrity or availability of personal information and other IT Assets. We are committed to respecting the confidentiality of personal information of all our People and business partners.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Privacy Statement*
- *Attindas GDPR Compliance Policy and Manual*
- *Attindas Protection of Privacy and Security of Protected Health Information (PHI) - HIPAA Policy (US)*
- *Attindas IT Acceptable Use Policy*

For more information please contact:

- *HR Department*
- *Law Department*
- *IT Department*
- *Data Protection / Privacy Officers*





WE KEEP IT UNIQUE

We will only process personal information which is reasonably necessary to or compatible for the effective operation of our business.

We are committed to safeguarding these valuable assets throughout the lifecycle of the personal information processing (from collection to deletion) in compliance with all applicable privacy and data protection laws and regulations, including HIPAA, US Consumer Privacy laws and the European General Data Protection Regulation (GDPR).

Resources

In the following pages you will find information about where to look for more information, additional contacts and how to report any concerns or misconduct.



Share your concerns

Anyone submitting a report is encouraged to put his/her name to the report, but they may also communicate anonymously, where permitted by local laws.



We Report illegal or unethical behavior

You must promptly report any suspicion of illegal or unethical behavior including a violation of our Code.

We are committed to open communication

We want you to feel comfortable and encourage you to approach our management team or a HR representative in first place in situations where you believe a violation may have occurred.

We provide with secure and confidential means to report violations

In addition to our open-door policy, we maintain a Whistleblower Program as another mean to report violations. Our Whistleblowing Program is an early warning system to reduce risks, and an important tool to foster high ethical standards and maintaining customer and public confidence in us.

You can report violations through one of the following confidential means of communication:

• **Our Compliance Officer:**

- in person or by telephone to Tel: +34915096000 / +34606795234
- by mail: Attindas office at Pozuelo de Alarcón, Madrid, Spain - Laboratorios Indas, SAU: Paseo del Club Deportivo 1, Edificio 18, Planta Baja, Parque Empresarial La Finca, Pozuelo de Alarcón, 28223, Madrid, Spain - Attention: Compliance Officer (Strictly Confidential)
- by email: whistleblower@attindas.com

• **Online at our Whistleblower Site:** <https://report.whistleb.com/en/attindas> - Complainants may report their concerns anonymously, except where not permitted by local laws (they will be informed in such case).

All reports will be kept strictly confidential. You are encouraged to put your name to any report you make, but you may also report your concerns anonymously, except where not permitted by local laws. The Whistleblowing Site is provided by an external partner, to ensure confidentiality and anonymity. The communication channel is encrypted and password-protected.

When can you use the Whistleblowing Program?

The Whistleblowing Program can be used to inform about a concern about something that is not in line with our values and ethical code, and that may seriously affect our organization or a person's life or health. You do not need proof of your suspicions, but all messages must be made in good faith. Misuse of our Whistleblower Program is not tolerated: anyone deliberately misusing the Whistleblower Program commits a serious regulatory violation and faces disciplinary sanctions.

We Protect whistleblowers

When responding to a complaint, we will act fairly with respect to any individual named in the complaint, the seriousness of the issue raised, the credibility of the information or allegations in the complaint, and the prospects of an effective investigation. With regard to individuals named in a complaint, the presumption of innocence applies for as long as a regulatory violation is not proven. Investigations will only be opened if there is reasonable suspicion of a serious wrongdoing.

We will not retaliate, or threaten to retaliate, against any complainant for reporting violations pursuant to our Code and our Whistleblower Protection Policy, or for any lawful act done by the employee in providing information to any government agency in a manner or as permitted by any relevant law or regulation.

We Enforce the Code

We will enforce the Code on a uniform basis, regardless of your position. Violations of the Code, including failures to oversee and supervise personnel, and retaliation against anyone who reports a violation of it, may be subject to disciplinary action. Our response to violations and resulting disciplinary action will depend upon the facts of the specific matter. Certain violations may also be crimes that could lead to individual criminal prosecution.



Applicable Policies available on Attindas Sharepoint site:

- *Attindas Whistleblower Protection Policy*

For more information please contact:

- *Compliance officer*
- *Law Department*



Additional resources

For More Information

Our Code provides a short overview of our policies and procedures. You can find more detailed information on each of the areas covered in the repository of policies on Attindas Sharepoint site.

Additional Resources and Points of Contact

For more information and advice on a specific situation, please consult the Human Resources Department, the Law Department or our Compliance Officer.

Human Resources:

Marcy Lemieux
Chief Financial Officer
Marcy.Lemieux@attindas.com

Avia Graves
Director, Human Resources
Avia.Graves@attindas.com

Law Department:

Alessandra Salvo
Director Legal North Europe &
North America
Alessandra.Salvo@attindas.com

José Hidalgo
Director Legal South Europe
Jose.Hidalgo@attindas.com

Andrea Luque
Law Department
Andrea.Luque@attindas.com

Compliance Officer:

José Hidalgo
Global Compliance Officer
Data Protection Officer Europe
José.Hidalgo@attindas.com



Making it personal