

**Code of  
Business Conduct for  
Business Partners,  
Distributors and  
Suppliers of the Companies  
of the Arfeldt Group S.A. de**

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## **1. MESSAGE TO OUR BUSINESS PARTNERS, DISTRIBUTORS, CONSULTANTS AND SUPPLIERS.**

Dear Business Partners, Distributors, Consultants and Suppliers:

Grupo Arfeldt S.A. de C.V, is constituted by a series of companies in the area of health, where each one of them has built through the years, a solid reputation based on its trajectory and the business ethics that we have always sought to characterize us.

We are certain of the aforementioned and that this is one of the reasons that has led us to meet you in business, commercial or collaborative projects of various types. We share with you, through this document, part of the philosophy of our group, the principles of our business ethics and the mechanisms we have implemented to protect our assets, of which our reputation is one of the most valuable.

This Business Code of Conduct for Business Partners, Distributors and Suppliers of the Arfeldt Group Companies is an excerpt from our Internal Code of Conduct.

We are aware that many of your organizations have their own codes. We also understand that it is not, and should not be, our position to impose this Code; However, by sharing it we intend to communicate to you in a clear and transparent manner the expectations of business ethics, which Arfeldt S.A. de C.V Group has, when doing business or collaborative projects with you.

Certain that the ethical principles and values that govern your action and that of your organizations are shared with us, we trust that you will welcome this Code.

## **2. OBJECTIVE**

Farmacéuticos Maypo, Stendhal Pharma, SíSalud, Farmacias Vida and other subsidiaries of the ARFELDT Group (hereinafter "ARFELDT"), are committed to upholding the highest standards of business integrity; To comply with the provisions of local and international anti-corruption laws and adhere to the highest ethical business standards in full compliance with applicable laws and regulations in jurisdictions where ARFELDT operates or does business.

In addition, ARFELDT expects each of its business partners, including but not limited to distributors, suppliers, vendors, agents, consultants, Speakers and in general, any third party acting on its behalf, to maintain the highest standards of business ethics and acting in full compliance with this Code and all applicable laws and codes, these include local anti-corruption regulations, as well as international anti-corruption laws, such as the US *Foreign Corrupt Practices Act. -FCPA-*), the UK *Bribery Act* and local anti-corruption laws.

This Code of Conduct summarizes ARFELDT's minimum expectations for all third parties with whom it does business.

## **3. SCOPE**

This Code of Conduct applies as a guide to all Business Partners, Distributors and Suppliers contracted by ARFELDT anywhere in the world. Our interest is your compliance and commitment to ethical behavior in business.

For the purpose of facilitating your adherence, a copy of this Code shall be provided to you at the time of the hiring or establishment of the business relationship or within thirty (30) days, after the agreement has been signed by both parties.

## **4. INSTITUTIONAL PHILOSOPHY**

ARFELDT conducts business based on its institutional philosophy, which it shares with third parties with whom it establishes business practices through this Code, with the confidence that by making them participants in its Mission, Vision and Values, it will find the necessary echo to build sustainable, ethical, and socially beneficial businesses. The mission of ARFELDT is to be an international organization that works to provide comprehensive public and private health solutions, under a unique business model, in order to provide well-being and quality of life. ARFELDT's Vision is to provide innovative and comprehensive health solutions based on a culture of social responsibility that foster human development, health, and quality of life for people under an economically sustainable business model. Complementing the Mission and Vision there is

a strong value scale that guides ARFELDT's business policies and behaviors , including:

**Excellence:** We work passionately and professionally, with efficiency in service and operation, to pursue perfection in what we do.

**Integrity:** We act ethically and honestly in all respects, fulfilling our commitments.

**Human Sense:** We treat patients, clients, partners and collaborators with respect, tolerance, and solidarity, because the well-being of people is our *raison d'être*.

**Innovation:** We look for new ideas, modern and creative solutions to preserve a cutting-edge and continuous improvement scheme.

**Transparency:** We are open to explaining at all times what we do, how we do it and what we do it for.

## **5. COMPLIANCE AND ETHICAL BEHAVIOR**

We define *Compliance* as the behavior aimed at ensuring compliance with our internal policies, external codes, and existing regulation and legislation, based on and congruent with our values, mission, and vision.

For Arfeldt, illegal or unethical business practices, those that depart from our values and in general any action that violates the laws are not acceptable under any justification. In this sense, it rejects any act of corruption and any business or operation that contravenes the laws, attempts, or acts of bribery, and therefore refrains from participating in, granting, offering, offering, soliciting, or accepting bribes from any official, entity or private or governmental body, supplier, or business partner.

ARFELDT is convinced that building a reputation is the product of many years of work and we consider it one of our most valuable assets. For this reason, we ask the third parties with whom we do business to make a commitment to the protection of this asset.

## **6. STANDARDS AND EXPECTATIONS**

ARFELDT hopes that the ethical behavior of those acting on its behalf will be reflected in all areas of business in which they participate and therefore cover all those who are in turn part and influence any activity related to ARFELDT.

The Internal Code of Conduct and policies related to Business Ethics provide the Group's managers and employees with a framework of appropriate business practices

. As an extension of its policies and for the purpose of establishing the minimum expectations that ARFELDT has of third parties with whom it does business, it establishes the following standards as minimum requirements when they carry out activities of any nature on their behalf.

**6.1. Regulatory and Legal Compliance.**

ARFELDT acts in full compliance with all applicable laws and regulations, and expects that third parties it conducts business with, in addition to their obligations under contractual agreements, to comply in the same manner with legal obligations imposed on them by applicable laws and regulations. To the extent that a contractual agreement contains more specific terms and conditions, these shall govern.

**6.2. Fair competition and anti-monopoly practices.**

Arfeldt fully relies on the quality of its products and the quality of the products of its Business Partners, and therefore openly opposes any practice affecting end consumers through pricing or any other practice that impairs free competition. ARFELDT rejects, does not participate, and expects its third parties not to participate in:

- Discussion and pricing with our competitors.
- Discussion and division of markets, territories, indications, or audiences.
- Discussion and definition of production volumes with competitors.
- Discussion and handling of bids.
- Blocking the incorporation of new competitors in the markets in which we participate.
- Price discrimination (*dumping*).

In all the topics described above, Arfeldt complies with existing local regulations and laws, and if they do not exist, we must adhere to the principles listed above in order to avoid any unfair commercial practices.

**6.3 Data Security and Privacy.**

ARFELDT expects its third parties to comply with all applicable local and international regulations regarding data protection and information privacy, including laws and regulations relating to the cross-border transfer of personal data.

The maintenance of appropriate procedures, safeguards, and controls to ensure and protect the confidentiality and integrity of all personal information received or processed on your behalf is a minimum expectation that ARFELDT has of third parties with whom it does business, including those in localities or countries that do not have local legislation in this regard.

**6.4. Confidentiality.**

When third parties with whom ARFELDT does business, due to the nature of the business, or to ensure that the requested service proposal complies with the requirements, in turn require the exchange of confidential information with other third parties, a confidentiality agreement must be established prior to the exchange of information, ensuring that ARFELDT's information is always protected and is not disclosed in whole or in part.

## **6.5 Anti-Corruption and Anti-Bribery.**

ARFELDT rejects any corrupt business practice, so its Anti-Bribery and Anti-Corruption Policy sets out two fundamental principles:

1. Comply with applicable anti-corruption laws, including the FCPA Act and the UK Bribery Act.
2. The prohibition of facilitation payments or bribes, even if it is required by the official or bureaucrat to comply with routine procedures to which we are entitled by law, as well as to offer money, benefits, entertainment, Promises of business or job offers or any exchange of value to individuals, government officials, parties or political candidates, in order to ensure any service, processing or obtaining any business, benefit or improperly influencing decisions affecting ARFELDT or a competitor.

ARFELDT requires third parties with whom it does business to apply the above principles whenever it performs activities of any nature on its behalf.

## **6.6 Government and authorities.**

ARFELDT requires that third parties with whom it does business, that all dealings that it makes on its behalf, before governmental agencies, be carried out with strict adherence to the laws and ethical conduct of business.

## **6.7. Conflict of interest.**

ARFELDT expects third parties with whom it does business to identify and avoid situations in which a potential conflict of interest arises, preventing business decisions from being influenced by personal interests or relationships.

In the case of identifying potential conflicts of interest, they are required to be shared, in order to evaluate them jointly.

ARFELDT requires proper handling of potential conflicts of interest and for this it shares with third parties with whom it does business, the guidelines set out in its Internal Policy of Conflict of Interest:

A conflict of interest is generated when a private interest affects or may affect (for or against) Arfeldt's interests, among which may be:

- Lack of objectivity in decision-making by having interests with competitors, suppliers, or customers.
- Receive benefits or promises of business for having a relative in positions as a public official.
- Generate benefits to family members who perform as customers, suppliers, competitors, or as employees within ARFELDT.

Therefore, it is prohibited to accept gifts, attentions, money, presents, valuables or preferential treatment from customers, suppliers, competitors, individuals, or companies that have commercial relations with Arfeldt. Likewise, it requests third parties with whom it does business to refrain from offering Gifts, attentions, preferential treatment, money, valuables or presents to ARFELDT executives and employees.

## **6.8 Outsourcing of Third Parties**

When third parties that the Arfeldt group uses to do business, under a legitimate principle, require outsourcing the services of a third party for the development of the contracted activities, these subcontracting cannot and should not be done with the stress of evading existing regulations or regulations. All third-party contractors shall have the same obligations and restrictions as set out in this Code.

## **7. RETENTION OF BOOKS AND RECORDS**

ARFELDT requires that all transactions and expenses incurred in its behalf or to provide it with a service, be accurately recorded and maintained in the books, records, and accounts of the third party with whom it does business, in accordance with applicable tax regulations.

Similarly, it requires documentation of reasonable support, in accordance with established accounting principles. ARFELDT considers the registration of non-existent matters, the falsification, manipulation, or misuse of information as fraud.

## **8. NON-COMPLIANCE**

ARFELDT, will only do business with third parties that comply with applicable international and local laws and regulations.

ARFELDT reserves the right to assess compliance with these requirements and adherence to this Code and expects third parties with whom it does business to remedy any non-compliance if it exists.

Third parties with whom ARFELDT does business are encouraged to report to the relevant channels any non-ethical conduct on the part of their officers and employees and to invite their third parties to establish internal channels of communication in order to facilitate their collaborators' reporting of non-ethical or illegal acts.

## **9. REPORTING DEVIATIONS**

ARFELDT has an anonymous and confidential reporting line at the service of its staff, which makes available to third parties with whom it does business. This means allows anyone to anonymously report violations by ARFELDT's personnel to this code, the laws, and regulations in force, as well as any reasonable suspicion of unethical acts, corrupt practices or violations of ARFELDT's values.

*TOLL-FREE: 01-800 31 03 310 (Mexico)*



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E-mail: [arfeldt@tipsanonimos.com](mailto:arfeldt@tipsanonimos.com)

FAX: +52 (55) 5255 1322

ZIPCODE: CON- 080, Mexico DF

All reports received are handled by a specialized external agency, to offer respectful treatment and to provide who denounces with safe, confidential, and anonymous handling.

**Acknowledgment of receipt of the Code of Conduct.**

Me, \_\_\_\_\_

in my character \_\_\_\_\_ ,

I note that I have received a copy of the Business Code of Conduct for

Business Partners, Distributors and Suppliers of the Arfeldt Group Companies.

Business Partner, Supplier or Distributor Name:

Location: \_\_\_\_\_ .

Date: \_\_\_\_\_ From \_\_\_\_\_

Legal Representative Name and Signature: