

Code of Ethics and Conduct

index

1. Introduction 3

- 1.1. Overview 4
- 1.2. Applicability and scope 5
- 1.3. Individual and collective responsibility 6
- 1.4. Leaders' duties 7

2. AUGMA Group Identity 8

- 2.1. Purpose 9
- 2.2. Mission 10
- 2.3. Vision 11
- 2.4. Core Values 12

3. General conduct guidelines 13

4. Business practices 15

- 4.1. Human rights and labour rights 16
- 4.2. Confidentiality and intellectual property 17
- 4.3. Data protection and privacy 18
- 4.4. Prevention of conflicts of interest 20
- 4.5. Transparency in professional relations 22
- 4.6. Compliance with laws and regulations 23
- 4.7. Prevention of corruption and related offences 24
- 4.8. Asset protection and management 26
- 4.9. Commitment to quality and satisfaction 27
- 4.10. Interaction with health professionals and health organisations 28
- 4.11. Fair competition 29
- 4.12. Transparency and communication with stakeholders 30
- 4.13. Marketing and sales statements 32
- 4.14. Relationship with the media and social networks 33

5. Commitment to sustainability 34

- 5.1. People 36
 - 5.1.1. Employee well-being and development 36
 - 5.1.2. Diversity, equity, inclusion and equal opportunities 37
 - 5.1.3. Preventing harassment and promoting a respectful environment 38
 - 5.1.4. Health and safety at work 39
 - 5.1.5. Substance use 39
- 5.2. Community 40
- 5.3. Environment 41

6. Application of the Code of Ethics and Conduct 42

- 6.1. Communication and reporting 43
- 6.2. Drafting, reviewing and updating the Code 45
- 6.3. Awareness and commitment 47
- 6.4. Consequences of non-compliance 48

Annexes 49

- AUGMA Group companies 50
- Applicable to AUGMA Group companies in Portugal 51

1. Introduction

1.1. Overview

The present Code of Ethics and Conduct (“Code”) establishes the principles that guide the conduct and behaviour of the AUGMA Group. This Code serves as a reference to ensure that all actions and decisions are aligned with the Group’s core values, promoting business practices and an ethical, safe and sustainable working environment, where everyone is encouraged to act with integrity and responsibility.



1.2.

Applicability and scope

The present Code applies to all employees of all AUGMA Group companies (regardless of their location, function and employment relationship), consultants, service providers, business partners and anyone who, directly or indirectly, acts on behalf of the Group or in any way relates to it.

As of today, the AUGMA Group includes the following companies:

- **Portugal:** Quilaban and Cordeiro Saúde
- **Angola:** Australpharma and TecnoSaúde
- **Mozambique:** MDS – Medicamentos e Diagnóstico na Saúde
- **Guinea-Bissau:** NôLab
- **India:** Quilaban Pharma Trading

Full details of the above companies, including their company names and addresses, can be found in Annex I.



1.3.

Individual and collective responsibility

Everyone who collaborates with or represents the AUGMA Group must be fully aware of and follow the principles and behaviours described here, and non-compliance will result in appropriate corrective action. This collective commitment is a crucial condition for any employment or commercial relationship with the Group, strengthening our organisational culture, protecting our reputation and consolidating trust among all stakeholders. Employees' duties include:

- Compliance with the Code of Ethics and Conduct.
- Promptly report any observed deviation or behaviour that goes against the principles and conduct described here.
- Actively participate in initiatives and projects, contributing to the continuous improvement and success of the Group.
- Demonstrate commitment and responsibility in all activities performed.
- Carry out duties with professionalism, commitment, as well as a focus on excellence, promoting personal and collective development.

- Develop skills and strengthen knowledge, contributing to innovation and the Group's sustainable growth.
- Treat colleagues and all stakeholders with dignity, respect, as well as empathy.
- Promote an inclusive and collaborative environment, valuing differences and diversity.



1.4.

Leaders' duties

AUGMA Group leaders, including directors, managers, coordinators and supervisors, play a key role in promoting and consolidating an ethical and responsible culture, undertaking the following responsibilities:

- Be role models: Set standards of ethical behaviour by incorporating the principles of the Code into all their actions and decisions.
- Communicate clearly: Ensure that employees understand the standards, core values, as well as the requirements set out in the Code.
- Create a safe and open environment: Fostering a culture of transparency and respect, where ethical issues can be discussed without fear of reprisals.
- Support the resolution of ethical dilemmas: Providing guidance to employees in identifying and resolving situations that may involve ethical dilemmas, promoting informed decisions in line with the Group's principles.
- Promote the proper use of whistleblowing channels: Encouraging employees to report behaviour that breaches this Code, ensuring confidentiality and the protection of all parties involved.

- Monitor and enhance compliance: Supervising compliance with the established principles and practices, correcting deviations and promoting initiatives that enhance the Group's core values.

The example set by leaders sets the tone for the organisational culture. Their daily commitment to ethics and integrity is crucial to consolidating an organisation of trust, responsibility, as well as excellence.

2. AUGMA Group Identity

2.1.

Purpose

Caring for the health and well-being of people like us.

At AUGMA Group, we believe that every person deserves access to quality healthcare. Our purpose is to look after everyone's health and well-being, promoting solutions that improve the lives of the people and communities we serve. Our commitment to health goes beyond the products we market and is reflected in a holistic vision of well-being and sustainable development.



2.2.

Mission

Promoting access to healthcare.

We promote access to healthcare through procurement, representation, training, distribution, consultancy and healthcare solutions, at the service of individuals, healthcare professionals and public and private organisations.

2.3.

Vision

To be the partner of reference in the development and implementation of efficient, integrated and innovative healthcare access solutions.

Our knowledge and experience in the proximity health services markets, the competence of our professionals, as well as our culture of partnership, combined with high standards of ethical, professional and business conduct, make us a benchmark in the promotion and provision of health care.



2.4. Core Values

Partnership

We promote co-operation and the integration of skills through partnerships based on dedicated service, trusting relationships and easy, transparent relations with our business partners.

Trust and Commitment

We foster trust through close relationships and competent and ethical approaches, delivering what we pledge. We are committed to promoting health and well-being as a contribution to a more prosperous and sustainable world.

Innovation and Passion

Innovation is a central feature of our culture, through which we are creative and unique in our approaches and solutions. We are passionate about discovering new possibilities, finding answers to complex problems, as well as simplifying people's lives.



3. General conduct guidelines

3.

General conduct guidelines

Creating economic and social value in a sustainable way, based on high ethical standards.

This is the basis that underpins our actions. And those standards are guaranteed by a set of founding principles that guide our conduct and must be upheld in all circumstances:

- **Commitment to sustainability:** We integrate the Sustainable Development Goals (SDGs) of the 2030 Agenda into our strategies and operations, aligning our actions with the 10 Principles of the United Nations Global Compact.
- **Respect for human rights:** We guarantee decent working conditions, tackling all forms of discrimination, child labour and forced labour, while promoting equal opportunities and safety for all.
- **Integrity and ethics in business:** We operate with honesty and transparency, complying with applicable laws and regulations and ensuring fair and competitive business practices.
- **Social responsibility:** We contribute to the well-being of the communities where we are present by organising and participating in initiatives that promote health, education, as well as social inclusion.
- **Environmental protection:** We implement responsible practices that preserve natural resources and reduce the environmental impact of our operations.
- **Collaboration and cooperation:** We maintain an open dialogue with our stakeholders, including governments, regulators and industry bodies, collaborating with investigations in a transparent and responsible manner.
- **Ethical value chain:** We work with suppliers and partners who share our core values and principles.

4. Business practices

4.1.

Human rights and labour rights

We promote and respect human and labour rights in all our activities. Said principles embody our commitment to the dignity, equality and safety of all, whether employees, partners or members of the communities where we operate.

AUGMA Group commitments

- Aligning practices with the fundamental principles of the conventions of the International Labour Organisation (ILO) and the United Nations Global Compact.
- Ensuring that our operations and supply chain respect human and labour rights, regardless of local regulatory specificities.
- Acknowledge and respect freedom of association and the right to labour representation, ensuring a safe and retaliation-free environment for the exercise of said freedoms.
- Preventing and eradicating all forms of child labour, forced labour or labour in conditions analogous to slavery, through a rigorous supplier selection and monitoring policy.
- Offer decent, safe, as well as discrimination-free working conditions, promoting equal opportunities and respect for diversity.

Expected behaviour

- Ensure that all actions follow the fundamental principles of human and labour rights.
- Respect and support the freedom of association and labour representation of colleagues, promoting a cooperative and inclusive working environment.
- Report any situation that goes against the Group's commitments, especially in cases of rights violations in operations or the supply chain.

4.2.

Confidentiality and intellectual property

Confidentiality and intellectual property management are crucial to protecting our competitiveness, innovation and integrity. Said commitment covers both internal information and data entrusted by our suppliers and partners.

AUGMA Group commitments

- Protect sensitive information, including commercial data, strategies and partner information, ensuring confidential treatment at all times.
- Respect and protect the intellectual property rights of both the Group and third parties, using only duly authorised materials and technologies.
- Ensure the registration and protection of the Group's institutional brands, reinforcing corporate identity.

Expected behaviour

- Keeping confidential information in their custody secret, ensuring that only authorised persons have access to it.
- Immediately report any suspected breach of confidentiality or misuse of intellectual property.
- Respect and use the Group's institutional brands in accordance with the established rules.



4.3.

Data protection and privacy

We fully comply with the data protection standards applicable in the geographies where we operate, respecting local legislation and regulations in each country. Said commitment ensures that the personal information of employees, customers, suppliers and other stakeholders is treated with the utmost security and confidentiality, in line with international best practice. In the companies located at Portugal, we specifically follow the European Union's General Data Protection Regulation (GDPR).

AUGMA Group commitments

- To collect and process personal data exclusively for lawful purposes and in accordance with the applicable legislation in each country where we operate, respecting the rights of data subjects.
- To implement appropriate technical and organisational measures to protect data against unauthorised access, loss or alteration.
- To ensure that only duly authorised employees or partners have access to personal data.
- To ensure dedicated and accessible channels for data subjects to exercise their rights in a simple and efficient manner, respecting applicable local regulations.

- For companies in Portugal, ensuring strict compliance with the GDPR, including the appointment of Data Protection Officers to support data subjects.

Expected behaviour

- To protect personal and confidential information to which they have access, using it only for authorised purposes and in compliance with internal and local regulations.
- To adopt good day-to-day practices to avoid risks such as misuse of devices or unauthorised sharing of information.
- To immediately report potential security breaches or incidents related to personal data to the channel provided by the company.
- To participate in training and awareness-raising activities organised by the Group to reinforce knowledge of data protection.

4.3.

Data protection and privacy

Request and incident management

We provide centralised channels for managing requests relating to the rights of data subjects:

- For companies in Portugal: dadospeessoais@quilaban.pt (Quilaban) and protecaodedados.clinicas@cordeirosaude.pt (Cordeiro Saúde).
- For companies outside of Portugal, owners must report potential situations to the local general manager, who will follow up or process them as necessary, respecting the legal and regulatory provisions applicable in each jurisdiction.

In the event of a data breach or suspected breach, employees must immediately report the matter to the company's Data Protection Officer, where applicable. The Data Protection Officer will take the necessary measures to protect the data and the rights of the data subjects, namely:

- Report incidents to the competent authorities within the legally established timeframe.

- Duly analyse the cause of the incident and implement corrective measures to prevent recurrences.
- Inform data subjects whenever necessary, explaining the measures adopted to mitigate impacts.



4.4.

Prevention of conflicts of interest

We favour a culture in which employees place the interests of the Group above any personal or external interests. A conflict of interest occurs when an employee's private, social or financial interests interfere, or appear to interfere, with their ability to act in the best interests of the Group. Conflicts of interest can arise through indirect relationships, such as partnerships, friendships or family ties.

Preventing conflicts of interest is paramount to protecting our reputation, ensuring transparency in professional relations, as well as maintaining the trust of our stakeholders. Examples of conflicts of interest include:

- Entering into contracts or transactions with suppliers in which the employee or close family members have a financial interest.
- Acceptance of personal benefits or advantages offered by suppliers, customers or partners.
- Use of privileged information acquired within the Group to obtain personal advantages or for third parties.
- Participation in decisions involving competing companies, customers or suppliers with whom there are personal or financial relationships.

AUGMA Group commitments

- Implement clear policies and procedures to identify, assess and manage potential conflicts of interest.
- Ensure that decisions relating to suppliers, customers or partners are made exclusively on the basis of objective criteria and in line with the Group's interests.
- Promote a culture of transparency and responsibility, encouraging the communication of potential conflicts of interest.
- Ensure that employees have access to clear guidelines and support for dealing with situations that could jeopardise their impartiality.

Expected behaviour

- Promptly report any situation that could represent a conflict of interest.
- Ensure that decisions taken in the performance of duties are aligned with the interests of the Group and do not favour personal interests or those of third parties.

4.4.

Prevention of conflicts of interest

- Avoid situations that could jeopardise impartiality, such as carrying out activities on behalf of one's own account that directly interfere with the Group's business.
- Refrain from participating in decisions involving companies or people with whom one has significant family, financial or personal ties.
- Participate in training and awareness-raising organised by the group to recognise and prevent conflicts of interest.
- Consult either immediate superior, the finance department or the general department if unsure about potential conflicts.



4.5.

Transparency in professional relations

Transparency in professional relationships is crucial to maintaining trust in all our internal and external interactions. We ensure that all professional relationships are conducted clearly, honestly and in line with our ethical principles.

We fully acknowledge that issues such as family relationships can arise in the workplace. Such situations must be handled with complete impartiality, ensuring that they do not jeopardise decision-making, evaluation and promotion processes.

Our commitment to fairness and transparency is reflected in all our interactions with employees, suppliers, partners and third parties.

AUGMA Group commitments

- Ensure that all professional relationships are conducted ethically.
- Implement processes that ensure impartiality, especially in situations involving family relationships or other personal connections between employees.

- Ensure that decisions relating to performance appraisals, promotions or any other process are taken fairly, without undue influence or privileges derived from personal relationships.
- Extend this commitment to partners, suppliers, as well as third parties, ensuring that all interactions with the Group respect the same principles.

Expected behaviour

- Report potential conflicts of interest, including situations involving family or personal relationships that could influence decisions in the workplace.
- Ensure that personal relationships do not interfere with impartiality or the fulfilment of professional responsibilities.
- Operate with honesty and transparency in all interactions, reporting any situation that could jeopardise the fullness of professional relations.

4.6.

Compliance with laws and regulations

We operate in a highly regulated industry, where the quality and legal compliance of our activities are key requirements. With a presence in different geographies, we recognise that each market has unique legal and regulatory specificities.

Our approach aims not only to respect local laws, but also to integrate global practices that strengthen the trust of our stakeholders and increase our impact. We also endeavour to go beyond strict compliance with legislation, aligning our practices with international certification standards in an effort that reflects our commitment to excellence and continuous improvement.

AUGMA Group commitments

- Fully comply with all applicable legal and regulatory requirements in all geographies where we operate, including tax, labour, environmental and health and safety standards.
- Ensure that all the products and services we offer comply with the specific regulatory requirements of each country or region in which we operate.
- Maintain an open and collaborative dialogue with governments, local authorities and regulators, ensuring that all official requests, inspections or investigations are handled professionally.

- Ensure compliance with embargoes, economic sanctions and other restrictions imposed by competent authorities.
- Continuously monitor changes in the legal and regulatory framework.
- Carry out periodic internal and external audits to assess the compliance of our practices.
- Evaluate the performance of our suppliers, ensuring that their practices are in line with the standards required by the AUGMA Group.
- Identify opportunities for improvement, promoting continuous excellence in our operations and value chain.

Expected behaviour

- Know and follow the regulations applicable to the sector.
- Actively participate in training programmes that enhance understanding of legal and regulatory requirements.
- Immediately report any suspicion of non-compliance or concerns related to laws, regulations or restrictions imposed by authorities.

4.7.

Prevention of corruption and related offences

The integrity of our practices is a non-negotiable principle. We reject any form of bribery, corruption or money laundering, promoting ethical and transparent business practices in all geographies where we operate.

In Portugal, where applicable, we fully comply with the General Framework for the Prevention of Corruption (GFPC), adopting reinforced measures to prevent, detect and respond to illicit practices. We recognise that these practices undermine economic justice, fair competition and trust in the markets.

Facilitation payments and bribery

Facilitation payments, known as “kickbacks”, are defined as small payments made to guarantee or speed up services to which a person would already be entitled. Said practices are prohibited, regardless of the cultural context or their frequency in certain markets.

Bribery, a common form of corruption, is illegal and is defined as the offer, acceptance or solicitation of benefits to influence decisions.

Any employee who receives, participates in or tacitly approves a bribe, kickback or any other illegal payment will be subject to disciplinary action, up to and including dismissal.

Corruption

Corruption in any form jeopardises the integrity of the Group and the fair functioning of the markets. We adopt a firm stance of prevention, encouraging the reporting of suspicious situations and protecting whistleblowers against reprisals.

Money laundering

Money laundering consists of concealing the illicit origin of funds through legitimate commercial or financial transactions.

4.7.

Prevention of corruption and related offences

AUGMA Group commitments

- Prohibit facilitating payments and bribery practices, ensuring that all financial transactions are conducted ethically and transparently.
- Adopt a policy of zero tolerance for corruption, promoting awareness and ongoing training to prevent and identify these practices.
- Implement strict controls to prevent money laundering practices, ensuring that all transactions are legitimate and traceable.
- Carry out periodic internal and external audits to monitor and enhance compliance with established policies and standards.
- Co-operate fully with authorities and regulatory bodies in cases of investigation related to bribery, corruption or money laundering.

Expected behaviour

- Refuse any facilitating payment or attempt at bribery, immediately reporting such situations to their superior or to the Group's whistleblowing channel.
- Ensure that all financial transactions and commercial decisions are made on the basis of objective criteria.
- Identify and reporting behaviour or transactions that may raise suspicions of corruption or money laundering.
- Consult leadership or the finance department in cases of doubt about the legitimacy of a commercial action or decision.
- Participate in training and initiatives that reinforce knowledge about the prevention of bribery, corruption and money laundering.



4.8.

Asset protection and management

Our assets are crucial to the success and sustainability of our business, and every employee must fully protect and use these resources responsibly.

Any theft, fraud or misuse of Group property or the personal property of other employees is strictly prohibited. Examples of misuse include stealing materials, submitting false expenses or withholding benefits that belong to the company.

AUGMA Group's commitments

- Safeguard company assets by implementing security processes and measures to protect physical, financial and intellectual assets from loss, theft, damage or misuse.
- Keep complete and accurate records of all transactions, assets and liabilities.
- Implement procedures to ensure that records are kept, stored and destroyed as required and in compliance with applicable laws.
- Promote the use of the Group's resources exclusively for professional purposes and in accordance with internal policies.

Expected behaviour

- Use the Group's assets responsibly, avoiding waste and ensuring that they are utilised for their intended purpose in a sustainable manner.
- Promptly report any suspected misuse, loss or damage to the Group's assets through the appropriate channels.
- Protect the Group's brands and other intellectual assets, as well as respect the intellectual property rights of third parties.

4.9.

Commitment to quality and satisfaction

The excellence of our practices and the satisfaction of our customers and business partners are paramount to our success. We continually work to exceed expectations, ensuring that the products and services we provide are aligned with high standards of excellence and innovation.

AUGMA Group commitments

- Ensure that products and services meet applicable regulations and the expectations of customers and partners.
- Adopt a proactive approach to evaluating and monitoring suppliers, selecting partners aligned with ethical values and a commitment to quality and sustainability.
- Implement effective quality management processes, including external and internal audits and monitoring mechanisms.
- Carry out annual satisfaction assessments and implement continuous improvement actions based on feedback from employees, customers and partners.
- Maintain the Occurrence Management System (OMS) to ensure the swift identification, analysis and resolution of problems, implementing corrective and preventive actions.

Expected behaviour

- Promptly report or record in the OMS any occurrence that could jeopardise the quality of our performance or the satisfaction of our customers and partners.
- Notify customers that their complaints are being duly analysed, ensuring clear communication and effective solutions.
- Contribute to continuous improvement by registering opportunities and suggestions in the OMS.
- Actively participate in initiatives that promote excellence and fulfilment of the defined quality standards.

4.10.

Interaction with health professionals and health organisations

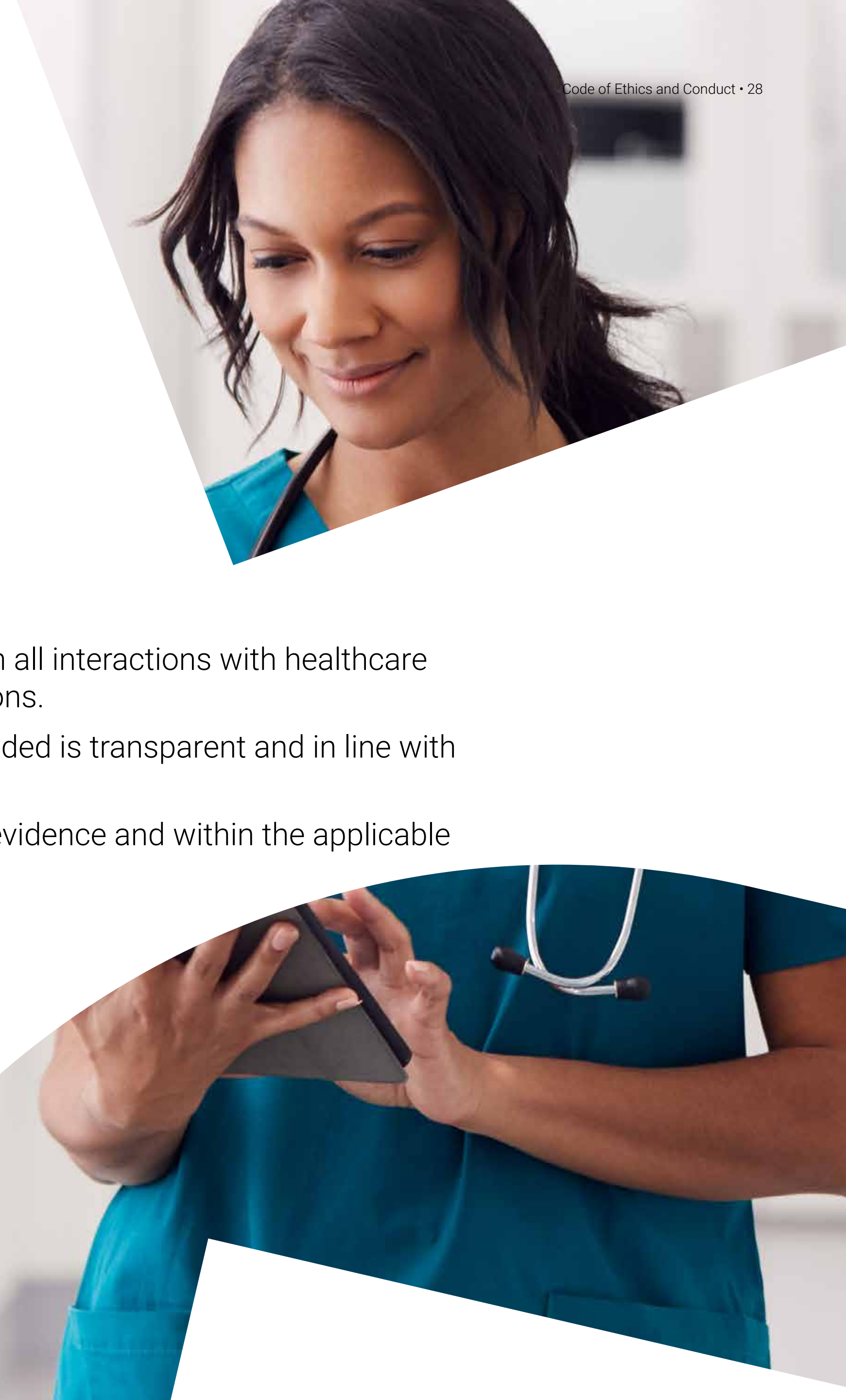
Interactions with healthcare professionals and healthcare organisations are crucial to fulfilling our mission of improving access to healthcare and must be maintained with complete integrity and transparency.

AUGMA Group commitments

- Ensure that all interactions respect the highest standards of ethical and professional conduct and the responsibilities laid down in laws and regulations.
- Document and maintain the transparency of any form of support or collaboration, ensuring that it does not interfere with the autonomy of clinical decisions.
- Provide scientific information based on evidence, contributing to the development of medicine and the improvement of clinical and laboratory practice.

Expected behaviour

- Act ethically and impartially in all interactions with healthcare professionals and organisations.
- Ensure that any support provided is transparent and in line with the Group's ethical principles.
- Share information based on evidence and within the applicable regulations.



4.11.

Fair competition

We respect the principles of fair competition, ensuring that our business practices are fully aligned with high ethical and legal standards, as well as protecting the trust of our partners.

AUGMA Group commitments

- Comply with competition laws in all markets where we operate.
- Reject illicit agreements by not participating in agreements or practices that could limit competition, such as price fixing, market division, manipulation of competition or boycotts of suppliers or customers.
- Not sharing sensitive information about competitors or business practices outside the limits permitted by law.
- Provide resources and guidance to ensure that all employees understand and comply with fair competition standards, including regular training in ethical business practices.

Expected behaviour

- Avoid improper arguments with competitors that could be interpreted as attempts to set prices, divide markets or reduce competition. Examples include exchanging confidential information about prices, market strategies or commercial policies.
- Basing negotiations with suppliers and customers on fair and transparent interactions, without coercive practices or behaviour that undermines fair competition in the market.
- Report suspicious practices.

4.12.

Transparency and communication with stakeholders

Transparency and clear communication are key to building and maintaining relationships of trust with our stakeholders. Said commitment is showcased in the continuous sharing of complete, truthful, accessible and verifiable information about our performance, initiatives and impacts, promoting a culture of dialogue and mutual trust.

We are also committed to strict compliance with all legal and regulatory duties, including the reporting of mandatory information to the competent authorities.

AUGMA Group commitments

- Publish an annual Integrated Annual Report that combines independently audited financial statements with the results of sustainability initiatives, offering a comprehensive view of our global performance.
- Ensure reporting to the United Nations Global Compact, through the annual submission of the Communication on Progress (CoP), reinforcing the commitment to the 10 Principles of the Global Compact and the global sustainability targets.
- Share market and business information, ensuring that represented companies, partners, as well as other stakeholders receive relevant and up-to-date information.
- Promote strategic dialogue through forums, regular meetings and accessible channels to foster solid and mutually beneficial partnerships.
- Ensure that all reports and statements sent to public authorities are complete, accurate and duly submitted within the time limits required by law.

4.12.

Transparency and communication with stakeholders

Expected behaviour

- Ensure that all interactions with stakeholders are guided by the Group's ethical principles and the clear and respectful sharing of information.
- Reinforce trust in relationships through integrity and a commitment to clarity in communications.
- Actively use established channels to share suggestions and feedback that contribute to improving stakeholder relations and the quality of communication.
- Ensure that all relevant transactions and activities are duly recorded and documented in order to facilitate compliance with reporting obligations.
- Reply promptly and transparently to requests for information, inspections or audits carried out by regulatory bodies.



4.13.

Marketing and sales statements

Ensuring that all marketing and sales communications are honest, accurate and well-founded is crucial to maintaining the reputation and trust of our customers and partners. We are therefore fully committed to presenting and promoting our products and services in a clear and truthful manner, complying with the applicable regulations.

AUGMA Group commitments

- Develop institutional and promotional materials that are factually correct, clear and not misleading.
- Ensure that all marketing and sales activities comply with applicable laws and regulations, including specific health sector standards.
- Ensure that all claims relating to product performance are supported by verifiable evidence and made available by manufacturers.
- Subject the marketing materials we develop to a rigorous review process before they are published.
- Avoid greenwashing practices, ensuring that all claims related to sustainability and environmental impact are supported by concrete and verifiable evidence.

Expected behaviour

- Ensure that claims about products or services are accurate, as well as in line with the information and support provided by suppliers.
- Avoid making statements that could be interpreted as false, misleading or that could mislead customers.
- Share information about promotions, discounts or commercial policies in a clear and understandable way.

4.14.

Relationship with the media and social networks

We fully understand the importance of the media and social networks in promoting our brands and communicating with our audiences. However, said interaction must be guided by responsibility, consistency, as well as alignment with our identity.

AUGMA Group commitments

- Ensure that all communications reflect the identity of the Group and its individual companies, promoting an image of trust.
- Appoint authorised spokespersons to speak on behalf of Group companies in interactions with the media.
- Monitor social media presence to ensure that the content published is in line with our core values and practices.

Expected behaviour

- Showcase professional conduct on social media, avoiding sharing information that could damage the Group's reputation or create conflicts of interest.
- Refrain from issuing public statements or answering queries from the press or the public on behalf of the Group, unless expressly authorised to do so.
- Report incorrect or damaging information to the Group identified on social media or in the press to the General Management, as well as to the Marketing and Communications department.

5. Commitment to sustainability

5.

Commitment to sustainability

We are fully committed to generating value for everyone we serve, fostering practices that balance economic growth, social development and environmental preservation. Creating positive and sustainable impacts is not just an objective, but a principle that guides our strategy and operations.

Our social and environmental responsibility initiatives are underpinned by the LINK Programme, structured to promote the well-being of our people, respect for the environment and make a difference in the communities of the countries where we operate. Through said programme, we enhance our commitment to creating a more sustainable and inclusive future, taking care of everyone who is part of our ecosystem.

We also take on the responsibility of positively influencing our value chain by adopting sustainability criteria as an integral part of our supplier selection and performance assessment processes. We also recognise that this is a mutual learning relationship, allowing us to integrate the good practices we identify in our partners and thus reinforce our joint commitment to a positive and sustainable impact.



5.1.

People

Employees are the soul of the Group, giving life and dynamism to its purpose. We are therefore committed to creating a working environment that prioritises well-being, promotes continuous development, as well as respects diversity, guaranteeing a level playing field for all.

5.1.1. Employee well-being and development

We believe that the well-being and development of our people is paramount to our success. Said relationship is based on a mutual commitment: while we provide the right working conditions, invest in resources, training and initiatives that promote health and personal and professional growth, employees are expected to have professional ethics and be actively and productively involved in their jobs and the work environment.

AUGMA Group commitments

- Promote continuous growth by developing training and qualification programmes so that employees can evolve and contribute to the organisation's objectives.

- Encourage a positive and healthy working environment, promoting a balance between personal and professional life.
- Implement initiatives that promote physical and mental health.
- Provide adequate resources for employees to carry out their duties efficiently, safely and satisfactorily.

Expected behaviour

- Showcase energy, dedication and responsibility in carrying out its duties, actively contributing to the fulfilment of objectives.
- Participate in training, development activities and well-being initiatives promoted by the Group.
- Contribute to a respectful and productive working environment based on trust, mutual support and team spirit.
- Take responsibility for your own personal balance by adopting healthy habits.

5.1. People

5.1.2. Diversity, inclusion, equity and equal opportunities

We value diversity as a driver of innovation and enrichment of the work environment. We are fully committed to treating all employees with equity, fairness and respect, regardless of gender, gender identity, age, race, ethnicity, religion, social background, sexual orientation, physical or mental abilities or disabilities, pregnancy, parenthood or any other factor.

AUGMA Group commitments

- Implement inclusive policies that ensure equal access to opportunities and promote an environment where everyone feels respected and valued.
- Guarantee fair recruitment, evaluation and career progression processes, based exclusively on merit and competences.
- Prohibit discriminatory, racist or marginalising practices, ensuring that the working environment is safe, respectful, as well as free of prejudice.
- Actively work to identify and eliminate barriers that can perpetuate inequalities.
- Raise awareness and train staff in the importance of building an inclusive and equitable environment, promoting respect for differences.

- Develop policies to balance gender representation at all hierarchical levels.
- Leading by example, challenging stereotypes.

Expected behaviour

- Respect and value individual differences.
- Adopt attitudes that promote mutual respect and contribute to building an inclusive environment.
- Recognise the unique contribution of each generation, from the experience of the older generations to the energy and new perspectives of the younger generations.

By promoting this, we guarantee an inclusive environment where everyone has the opportunity to thrive and contribute to collective success. Leaders have an added responsibility to foster equality, diversity and inclusion in their teams. Discrimination of any kind will not be tolerated and may result in disciplinary action.

5.1.

People

5.1.3. Preventing harassment and promoting a respectful environment

Any form of harassment, for whatever reason, is strictly forbidden in the workplace. We do not tolerate abusive, discriminatory, intimidating behaviour, bullying or inappropriate conduct, and any behaviour that creates an intimidating, offensive, abusive or hostile working environment is considered unacceptable.

AUGMA Group commitments

- Ensure an environment where everyone feels safe and can express themselves without fear of reprisals, promoting respect and dignity among colleagues.
- Provide confidential whistleblowing channels, protecting whistleblowers from counter-retaliation. To this end, a whistleblowing channel is already available on the institutional website.
- Ensure that all reports of harassment are investigated rigorously and impartially.

Expected behaviour

- Treat all colleagues, partners and third parties with respect and dignity.
- Report any situation of harassment or inappropriate behaviour.
- Ensure that communication and actions promote an inclusive and respectful environment, considering the impact they can have on others.
- Refrain from participating in communications that denigrate a person's race, ethnicity, religion, sex, gender, gender identity or other protected characteristics.
- Actively participate in initiatives and training that enhance good practices in the workplace.

5.1.

People

5.1.4. Health and safety at work

The health and safety of our employees is paramount.

AUGMA Group commitments

- Provide a safe working environment, promoting practices that protect everyone's physical and emotional integrity.
- Identify and mitigate risks, carrying out regular assessments and implementing preventive measures.
- Comply with applicable health and safety laws, regulations, policies and procedures.
- Promote training programmes to train employees in safety at work, first aid, emergency response and practices that minimise risks.
- Create conditions for employees to access healthcare.
- Implement health and well-being-orientated initiatives.

Expected behaviour

- Comply with all established safety regulations.
- Report any risk or incident immediately, helping to prevent future damage.
- Actively participating in consultations with employees, providing feedback and suggestions for continuous improvement.

5.1.5. Substance use

Employees may not distribute, possess or consume illegal or prohibited drugs on company premises or consume alcohol in a way that could affect safety or the performance of their work responsibilities.

Employees whose behaviour, decision-making capacity or performance is, or reasonably appears to be, affected by drugs or alcohol will be prohibited from entering company premises or engaging in company activities, and may be subject to disciplinary action.

5.2.

Community

We are committed to creating a positive and lasting social impact, valuing the well-being of employees, their families and the communities where we operate.

The LINK Programme is the central axis of our social responsibility actions, integrating initiatives that promote health, education, as well as social inclusion. Said programme reflects our commitment to active citizenship and social transformation, benefiting vulnerable groups and strengthening partnerships with local institutions.

We promote volunteering initiatives that involve employees, creating opportunities to balance personal and professional life while contributing to the sustainable development of the regions where we operate. Through said initiatives, we consolidate our role as agents of change, boosting the positive social impact in each community.

AUGMA Group commitments

- Involve employees in volunteering activities and social projects in line with local needs.
- Develop and support partnerships with institutions that promote health, education and social inclusion.
- Ensure that the LINK Programme remains the cornerstone of our social responsibility initiatives, covering employees, communities, as well as partners.

Expected behaviour

- Actively participate in social initiatives promoted by the Group, reinforcing the collective commitment to society.
- Recommend initiatives that can benefit the communities where we operate.
- Respect the Group's core values in all interactions with communities and social partners.



5.3.

Environment

We understand that preserving the environment is a shared responsibility between the Organisation, partners and employees. Said commitment is reflected in the integration of sustainable practices in all our operations, strengthening our supply chain and promoting the efficient use of resources.

We also recognise the importance of learning from our partners and the companies we represent, adopting their good practices to strengthen our positive impact. From import to export, we are fully committed to implementing solutions that optimise resources, reduce waste and minimise emissions throughout the supply chain.

AUGMA Group commitments

- Continuously evaluate our processes and adopt practices that minimise the environmental impact of operations, promoting the preservation of natural resources.
- Reduce the carbon footprint by implementing energy efficiency, waste management and sustainable logistics strategies.
- Measure our carbon emissions and implementing environmental compensation projects, helping to mitigate the impacts of our activity.

- Encourage suppliers and partners to adopt sustainable practices by setting joint environmental targets.
- Support partnerships and initiatives aimed at environmental preservation, contributing to the protection of ecosystems and the fight against climate change.

Expected behaviour

- Adopt conscious behaviours, such as responsible consumption and reducing waste in the workplace.
- Respect internal policies related to waste management and energy efficiency.
- Participate in initiatives and training promoted by the Group to strengthen sustainable practices, namely through the LINK Programme.
- Report situations or practices in the workplace that could jeopardise the Group's environmental commitments.

6. Application of the Code of Ethics and Conduct

6.1.

Communication and reporting

We foster a culture of open communication where employees, as well as other stakeholders, are encouraged to confidentially and safely report concerns or behaviours that contravene this Code. Some examples of situations that should be reported include:

- Violation of applicable laws or regulations.
- Discrimination or harassment practices.
- Misuse of company resources.
- Behaviour that compromises health, safety or the working environment.

Communication and reporting channels

At Quilaban, as required by legislation within the scope of the General Whistleblower Protection Regime (GDPR), we have a formal whistleblowing channel accessible through the institutional website (www.quilaban.pt).

For the other AUGMA Group companies, where there is no legal duty for a formal whistleblowing channel, we ensure compliance with local legislation. In said cases, any concerns or complaints should be

forwarded to the Group's Compliance Department, General Management or People and Culture Department, which will ensure the appropriate follow-up, respecting the legal and regulatory provisions applicable in each jurisdiction.

Whistleblower protection and complaint processing

To fully ensure compliance with the law and strengthen trust, it is crucial to listen openly to concerns raised by employees, respond appropriately and never retaliate against anyone who raises a question or concern in good faith. Any allegation of retaliation will be properly investigated and, if confirmed, appropriate disciplinary measures may be applied. Similarly, failure to report known violations may also result in disciplinary action.

AUGMA Group commitments

- To protect all whistleblowers against any form of retaliation or discrimination
- To keep reports confidential whenever possible, depending on the circumstances.

6.1.

Communication and reporting

- To ensure that all complaints are dealt with impartially and rigorously, determining the necessary corrective or preventive actions.
- To fully inform the whistleblower of the progress and outcome of the analysis, respecting the rights of all parties involved.

Expected behaviour

- To use the channels provided to report behaviour that may violate legislation, internal policies or this Code.
- To ensure that the information reported is accurate and made in good faith.
- To report any cases of retaliation and collaborate with related investigations.

6.2.

Drafting, reviewing and updating the Code

This Code is a dynamic document, adaptable to changes in the regulatory environment, the sector and global best practices. Its effective application requires ongoing training, periodic reviews and the commitment of all stakeholders.

Training and awareness-raising

It is paramount to ensure that the principles and standards of the Code are fully understood, complied with and applied by everyone.

AUGMA Group commitments

- Carry out periodic training, focussing on areas of greater risk or complexity, ensuring continuous updating on standards and best practices.
- Integrate the Code into the onboarding process for new employees.
- Enhance key messages regularly through internal communication campaigns and other awareness-raising initiatives.
- Share the Code with relevant business partners, promoting alignment with the Group's principles and conduct, as well as encouraging its formal endorsement.

Expected behaviour

- Actively participate in training and awareness-raising initiatives promoted by the Group.
- Ensure that the principles of the Code are understood and applied in daily activities.
- Promoting ethical alignment and encouraging good practices within teams.

Reviewing and updating the Code of Ethics and Conduct

This document is subject to periodic reviews to ensure alignment with the Group's evolution and stakeholder expectations.

AUGMA Group commitments

- Ensure that the Code is reviewed every 3 years or whenever significant changes require it, in line with stakeholder requirements and identified needs.
- Leading the review process through the Sustainability and Compliance areas, in collaboration with relevant areas, ensuring that the Code is up to date and reflects global best practice.

6.2.

Drafting, reviewing and updating the Code

- Implement continuous monitoring systems to assess the application and effectiveness of the Code, incorporating feedback from employees, partners and other stakeholders.
- Share any updates to the Code in a transparent and accessible manner, ensuring that all stakeholders are fully informed.

Expected behaviour

- Report concerns, suggestions or gaps in the Code, contributing to its continuous improvement.
- Provide relevant feedback during review processes.
- Adopt the practices disclosed, ensuring consistency with the group's ethical principles.



6.3.

Awareness and commitment

Application of the Code depends on the commitment of each employee and other stakeholders to comply with and adopt its principles and behaviours. Reading, understanding, as well as formally endorse the Code are key steps in ensuring consistent ethical conduct in all activities.

AUGMA Group commitments

- Request formal confirmation of reading and acceptance of the Code.
- Make the Code available in an accessible form on institutional websites, ensuring that all stakeholders can consult it easily.
- Share the Code directly with relevant business partners.
- Implement procedures, internal control systems, audits and channels to identify and correct deviations.

Expected behaviour

- Confirm that the Code has been read and acknowledged and that commitment is made to abide by the principles and standards set out therein.

- Demonstrate conduct in line with the Code in all professional relationships.
- Fully collaborate with investigation processes related to the Code.
- Use the appropriate channels to report any suspected violations, ensuring that reports are made in good faith.
- To serve as ambassadors for the Group's core values, building trust and promoting transparency in relations with stakeholders.

6.4.

Consequences of non-compliance

Failure to comply with the provisions of this Code may result in serious consequences for individuals and the Group, in particular:

- **Disciplinary sanctions:** Any failure to comply with the regulations and provisions of the Code can lead to disciplinary action, which can include reprimands, recorded reprimands, financial penalties, loss of holiday days, suspension from work with loss of pay and seniority or, in serious cases or repeat offences, dismissal without pay or compensation.
- **Legal action:** In situations where non-compliance involves illegal activities, measures may be taken that include reporting to the competent authorities. With reference to Portugal, the criminal sanctions associated with acts of bribery, corruption and related offences which, in abstract, may be applicable to employees are described in Annex II to this Code.
- **Impact on reputation:** Non-compliance with ethical standards has a negative impact on individual and organisational reputation, compromising stakeholder trust.



Annexes

Annex I

AUGMA Group Companies

Portugal

- **Quilaban – Química Laboratorial Analítica, S.A.**, TIN 500399670, with registered office at Beloura Office Park – Rua do Centro Empresarial, Edifício 11 – Quinta da Beloura, 2710-693 Sintra
- **(Cordeiro Saúde) GESSA – Clínica Médica das Fontainhas, Lda.**, TIN 503317489, with registered office at Beloura Office Park - Rua do Centro Empresarial, Edifício 11 – Quinta da Beloura, 2710-693 Sintra

Angola

- **Australpharma – Sociedade de Comercialização e Distribuição de Produtos Farmacêuticos, S.A.**, TIN 5401144733, with registered offices at Estrada de Luanda-Catete, Urbanização da Park Gest, km 24, Lote 3, ground floor, Municipality of Viana, Province of Luanda
- **Tecno-Saúde Angola (SU), Lda.**, TIN 5417067679, with registered offices at Estrada de Luanda-Catete, Urbanização da Park Gest, Km 24, Lote 3, ground floor, Municipality of Viana, Province of Luanda

Mozambique

- **MDS – Medicamentos e Diagnóstico na Saúde, S.A.**, TIN 400447071, with registered offices at Avenida do Trabalho, 1186, R/C, Bairro de Malanga, Maputo City

Guinea-Bissau

- **(NôLab) MDS – Sociedade de Importação, Exportação e Distribuição de Produtos Farmacêuticos, S.A.R.L.**, TIN 510108880, with registered offices at Avenida dos Combatentes da Liberdade e da Pátria, Bairro da Penha, Bissau, Guinea-Bissau

Índia

- **Quilaban Pharma Trading Private Ltd.**, a company registered under the number U51502MH2013PTC243798, with registered office at 503 Sai Samarth, 5th Floor, Deonar Village Road, Deonar, Mumbai, Maharashtra, India - 400088

Annex II

Applicable to AUGMA Group companies in Portugal

Crimes provided for in the Penal Code approved in annex to Decree-Law no. 48/95, of 15/03, in its current wording

Criminal Offenses	Criminal Framework
<p>Passive corruption (committed in the exercise of public duties) Art. 373 of the Penal Code</p>	<p>a) Imprisonment of one to eight years; or b) Prison sentence of one to five years.</p>
<p>Active corruption (committed in the exercise of public duties) Art. 374 of the Penal Code</p>	<p>a) Imprisonment of one to five years; or b) Imprisonment of up to three years or a fine of up to 360 days.</p>
<p>Undue receipt of advantage (committed in the exercise of public duties) Art. 372 of the Penal Code</p>	<p>a) Imprisonment of up to five years or a fine of up to 600 days; or b) Imprisonment of up to three years or a fine of up to 360 days.</p>
<p>Embezzlement (committed in the exercise of public duties) Art. 375 of the Penal Code</p>	<p>a) Imprisonment from 1 to 8 years, if a more serious penalty is not imposed by virtue of another legal provision; or b) Imprisonment of up to 3 years or a fine; or c) Imprisonment of up to 3 years or a fine, if a more serious penalty is not imposed by virtue of another legal provision.</p>
<p>Embezzlement by use (committed in the exercise of public duties) Art. 376 of the Penal Code</p>	<p>a) Imprisonment of up to 1 year or a fine of up to 120 days; or b) Imprisonment of up to one year or a fine of up to 120 days.</p>

Criminal Offenses	Criminal Framework
<p>Economic participation in business (committed in the exercise of public duties) Art. 377 of the Penal Code</p>	<p>a) Imprisonment of up to 5 years; or b) Imprisonment of up to 6 months or a fine of up to 60 days.</p>
<p>Extortion (committed in the exercise of public duties) Art. 379 of the Penal Code</p>	<p>a) Imprisonment of up to 2 years or a fine of up to 240 days, if a more serious penalty is not imposed by virtue of another legal provision; or b) Imprisonment from 1 to 8 years, if a more serious penalty does not apply by virtue of another legal provision.</p>
<p>Abuse of power (committed in the exercise of public duties) Art. 382 of the Penal Code</p>	<p>a) Imprisonment of up to 3 years or a fine, if a more serious penalty is not imposed by virtue of another legal provision.</p>
<p>Denial of justice and prevarication Art. 369 of the Penal Code</p>	<p>a) Imprisonment of up to 2 years or a fine of up to 120 days; or b) Imprisonment of up to 5 years; or c) Imprisonment from 1 to 8 years; or d) Imprisonment of up to 2 years or a fine.</p>
<p>Influence peddling Art. 335 of the Penal Code</p>	<p>a) Imprisonment of 1 to 5 years, if not more severe by virtue of another legal provision, if the purpose is to obtain a favourable unlawful decision; or b) Imprisonment of up to 3 years or a fine, if a more serious penalty does not apply by virtue of another legal provision, if the purpose is to obtain a favourable legal decision; or c) Imprisonment of up to 3 years or a fine; or d) Imprisonment of up to 2 years or a fine of up to 240 days.</p>
<p>Money laundering Art. 368-A of the Penal Code</p>	<p>a) A prison sentence of a minimum of more than 6 months or a maximum of more than 5 years; or b) Prison sentence of up to 12 years.</p>

Criminal regime for corruption in international trade and in the private sector established by Law no. 20/2008, of 21 April, in its current wording

Criminal Offenses	Criminal Framework
<p>Active corruption damaging international trade Art. 7 of Law 20/2008</p>	<p>a) Prison sentence of one to eight years.</p>
<p>Passive corruption in the private sector Art. 8 of Law 20/2008</p>	<p>a) Imprisonment of up to five years or a fine of up to 600 days; or b) Prison sentence of one to eight years</p>
<p>Active corruption in the private sector Art. 9 of Law 20/2008</p>	<p>a) Imprisonment of up to three years or a fine; or b) Imprisonment of up to five years or a fine of up to 600 days.</p>

Anti-economic offences and offences against public health provided for in Decree-Law no. 28/84, of 20/01, in its current wording

Criminal Offenses	Criminal Framework
<p>Fraud in obtaining a subsidy or grant Art. 36 of Decree-Law no. 28/84 of 20/01</p>	<p>a) Imprisonment of 1 to 5 years and a fine of 50 to 150 days; or b) Imprisonment from 2 to 8 years; or c) Imprisonment of up to 2 years or a fine of up to 100 days.</p>
<p>Misuse of subsidy, grant or subsidised credit Art. 37 of Decree-Law no. 28/84 of 20/01</p>	<p>a) Imprisonment of up to 2 years or a fine of not less than 100 days; or b) Imprisonment from 6 months to 6 years and a fine of up to 200 days.</p>
<p>Credit fraud Art. 38 of Decree-Law no. 28/84 of 20/01</p>	<p>a) Imprisonment of up to 3 years and a fine of up to 150 days; or b) Imprisonment of 5 years and a fine of up to 200 days.</p>

