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## 1. OBJECTIVES

The objectives of this policy are (a) To establish guidelines and contractors commitments in the contractual relationship with Laboratorios Legrand, allowing compliance with legal requirements; and (b) to jointly develop and apply mechanisms that promote ethical behavior, as well as the prevention of risks associated with fraud, bribery or any other corrupt practices; to which the parties may expose in carrying out transactions with third parties; (c) guarantees that Contractors and Business Partners are aware of the Transparency and Business Ethics Program of Laboratorios Legrand, formally express their obligation to comply with the regulations related to the prevention of Transnational Bribery and knowledge of the consequences of infringing it.

## 2. SCOPE

This policy applies to all regulated entities and especially to: (a) All companies where Laboratorios Legrand has an economic interest, which includes, but is not limited to: subsidiaries, consortiums, temporary unions, business allies, and contractors; (b) all the operations carried out by Laboratorios Legrand regardless of the jurisdiction where they are carried out (location); (c) All Contractors and Business Partners who expect to have or have a contractual relationship with Laboratorios Legrand, its subsidiaries or related parties, including those employees of the regulated entities.

## 3. RESPONSIBILITY

### 3.1. It is the responsibility of the Collaborators, Contractors, and Business Partners of Laboratorios Legrand:

- Know and comply with this policy.

## 4. DEFINITIONS

### 4.1 Contractor:


It refers, in the context of an international business or transaction, to any third party that provides services to a Legal Entity or that has a contractual legal relationship of any nature with it. The Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisers, consultants, and persons who are parties to collaboration or joint venture agreements with the Legal Entity.

### 4.2 Compliance Officer:

It is the natural person designated to lead and manage the Anti-Corruption Compliance Program.

## 5. GENERAL CONDITIONS

Does not apply

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## 6. DESCRIPTION OF THE POLICY

At Laboratorios Legrand, we believe in fair competition, and we assume the commitment not to participate in bribery acts or corruption, regardless of the jurisdiction in which we operate. We expect the same behavior from our directors and employees, as well as from our Contractors and business partners around the world.

In this sense and assuming the responsibility of this commitment, our practices in the market and the value chain will be guided by justice, equity, integrity, and rectitude inspired by the corporate principles and values that support ethical actions towards our Employees. and all interests' groups.

Culture permeated by our Contractors and Business Partners represents an essential; so, they also must assume the commitment of intolerance to corruption to achieve this.

In line with our commitment and awareness of the importance of developing the objectives of the Organization, conducting business transparently and honestly, and in strict compliance with the law, Laboratorios Legrand follows the provisions in the Policy for Bribery prevention and other corrupt behaviors. The Guide to implementing compliance programs for the prevention of behaviors is in article 2 of Law 1778 of 2016 (Superintendence of Companies of Colombia). The Pharmaceutical Industry Principles of the Pharmaceutical Supply Chain Initiative (PSCI) establishes guidelines regarding responsible business practices that they must assume by Contractors to prevent the risks of Bribery and other Corrupt practices.


### 6.1. Guidelines

In the development of relations between Laboratorios Legrand, its Contractors, and Business Partners, we expect the application of the following principles and the assumption of the following commitments:


- They must give strict compliance with: the law, provisions, and regulations issued by the authorities, especially what is established in (i) Law 1778 of 2016, through which rules are issued on the responsibility of legal persons for acts of transnational corruption and other anti-corruption provisions are enacted and (ii) Law 1474 of 2011– Anti-Corruption Statute- Art. 16 provides that within the framework of the contract there are no types of improper payments for the benefit of either party involved and there is also no type of favoring of any public authority to affect the proper decision-making of their responsibility.

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<sup>1</sup> Article 2 of Law 1778 of 2016 establishes that: “Administrative responsibility of legal persons. Legal persons that through one or several: Is the act by which a legal person, through its Employees, administrators, Associates, Contractors, or Subordinate Companies, gives, offers, or promises to a foreign public servant, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value or (iii) any benefit or utility in exchange for said public servant performing, omitting or delaying any act related to his functions. and about an international business or transaction.

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- Laboratorios Legrand will carry out the negotiations and operations of and with our contractors with ethics, transparency, and respect. The promotion of business ethics and the fight against bribery and corruption are fundamental practices for doing business with Laboratorios Legrand.
- Contractors and business partners must not accept or promote any form of corruption, including extortion and national and transnational bribery to obtain undue advantages to or from Laboratorios Legrand. They undertake to report them and take preventive actions in this regard, including the implementation of practices of Anti-bribery and Anti-corruption within your organization and with third parties.
- No value will be negotiated, accepted, or paid for situations such as extortion or similar events and all those actions that are not in the framework of the law. They must report said to the authorities.
- There will not be any relationship with groups and/or social actors outside the Constitution and the law to achieve the activities development.
- Contractors and business partners must have adequate control mechanisms to prevent the materialization of risks related to money laundering, terrorist financing, fraud, bribery, and any other corrupt practice.
- There will be no operations with third parties that are involved in the violation of human rights.
- Contractors and Business Partners, if required by law, must implement a system for the prevention of money laundering and the financing of terrorism.
- Refrain from offering and/or giving money or gifts that include hospitality to the employees of Laboratorios Legrand following the Policy on Gifts and Hospitality of Laboratorios Legrand.
- Contractors must carry out their activity in fair and open competition. They must use fair business practices, including non-deceptive and truthful advertising.
- Any relationship between the contractor and public officials will strictly comply with the rules and regulations to which they are subjected and those of Laboratorios Legrand.
- The contractor must not subcontract or engage third parties in any other way on behalf of Laboratorios Legrand or represent the Company before third parties without prior written consent.

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- The business relationship must never be used to create an incentive or bonus or to ensure improper business advantages for Laboratorios Legrand.
- The contractor must prepare and maintain books and records that document accurately and in reasonable detail all matters related to business with Laboratorios Legrand. Justifying all payments (including gifts, hospitality, entertainment, or any other value thing) made on behalf of Laboratorios Legrand or with funds provided by Laboratorios Legrand.
- Laboratorios Legrand may perform due diligence procedures on the contractor at any time to ensure that it complies with the principles and commitments acquired or confirm all payments made on behalf of Laboratorios Legrand. This power must be expressly stated in the contracts.
- Contractors must apply data privacy and security protection policy to the personal information they process.
- Contractors must encourage workers to report suspected or illegal activities in the workplace without receiving threats of retaliation, intimidation, or harassment. Contractors will investigate and take corrective action if necessary.
- Before initiating a commercial relationship, Laboratorios Legrand will carry out procedures to get to know contractors, which include but are not limited to: consultations in control lists, authorized databases, and public information to verify their reputation, and the intensity of due diligence is determined by relationship-specific risk areas. During the term of the business relationship, the valuation will be done regularly to keep updated information.
- The national and international Contractors will sign a formal declaration through which they undertake to comply with the anti-corruption laws of Colombia, the country where they carry out their business, the Transparency and Business Ethics Program of Laboratorios Legrand, and to carry out actions against Transnational Bribery. Attached is the document called "Certificate of Compliance Contractors or Business Partners" R649 through which contractors and business partners declare to know and accept this policy and the Transparency and Business Ethics Program of Laboratorios Legrand.
- The contracts will include obligations and guarantees of anti-corruption compliance, as well as the right of Laboratorios Legrand to terminate the contract in the event of non-compliance with said obligations and guarantees.
- Laboratorios Legrand will implement effective mechanisms with critical or highly exposed Contractors or business allies to determine whether they have programs or controls to prevent Bribery and other corrupt conduct. As well as their degree of effectiveness, including but not limited to interviews, surveys, and visits to verify the general conditions of contractors or business partners related to the prevention of Bribery and other corrupt conduct.

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- Contractors and business partners must transmit to their directors and collaborators the commitment of intolerance to Corruption and Promote compliance with the Laboratorios Legrand Transparency and Business Ethics Program.

Laboratorios Legrand Collaborators must be vigilant and consult the Compliance Officer or the Legal Representative of Laboratorios Legrand when noticing factors of high risk of corruption by contractors to evaluate whether they require further monitoring or due diligence. Also, if the contractual or business relationship should not proceed or continue.

Laboratorios Legrand expects contractors to comply with applicable legal regulations and work to comply with the standards contained herein. In some circumstances in which the Contractors and related third parties have demonstrated and continue to demonstrate a material commitment to improvement, Laboratorios Legrand promotes the maintenance of long-term business relationships with contractors that comply with what is established herein.

The principles and commitments established in this policy are part of but do not replace the terms of any contract between Laboratorios Legrand and its Contractors.

Any attempted violation of this Policy by a Contractor or business partner will result in contractual termination.

## 6.2. Declaration of Adhesion

As part of our commitment to transparency and integrity (which goes beyond simply complying with the law), at Laboratorios Legrand we accept the provisions of the Code of Ethics and Transparency of the Pharmaceutical Chamber of Andi (coming into force on the 16th of May 2016), which establishes the ethical conduct guidelines that Laboratorios Legrand must follow in its interrelationships with the different actors of the health system. Consequently, the Code is an integral part of the Transparency and Business Ethics Program of Laboratorios Legrand.

## 7. BIBLIOGRAPHY

- Colombia. Minute 100-000003 of July 26, 2016. By which the guide is issued to implement compliance programs for the prevention of conduct provided in article 2 of Law 1778 of 2016 is issued, Superintendency of Companies, 2016.

## 8. FORMATS GENERATED IN THE POLICY

<b>FORMAT NAME</b>	<b>CODE</b>
Does not apply	Does not apply

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## 9. ANNEXES TO THE POLICY

ANNEX NAME	CODE
Does not apply	Does not apply