

# ETHICAL CODE







Dear Collaborators,

I am delighted to present Ferrer's Ethical Code as I am convinced of the great importance of the moral regulations that should govern our relationship with society.

Integrity, which is one of our values, is a pillar on which to support our mission of promoting the well-being of society. Therefore, respect for ethical principles and the values associated to them should be a priority for all Ferrer's collaborators.

This Code establishes principles of action that aim to go beyond mere compliance with the regulations. The behaviour that each of us shows in our daily activity, whether in relations with third parties or with all the staff at Ferrer, is a fundamental aspect of our *raison d'être*.

I would like to thank you in advance for your support and responsibility in complying with this Ethical Code to continue constructing Ferrer's future.

Yours faithfully,

Sergi Ferrer-Salat Serra di Migni  
Chairman



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# INTRODUCTION

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The purpose of the Ethical Code is to establish the guidelines for behaviour for all the people who work at Ferrer when carrying out their everyday tasks.

It is the highest tier in the structure of regulations. Its principles are developed in the policies, regulations and procedures.

Ferrer takes on the commitment to develop all its activities in keeping with current legislation, meaning that the people who work at Ferrer will develop their professional activities in compliance with this legislation.

At all levels, the real and effective application of these principles, as well as the achieving of a high level of commitment to compliance with this Ethical Code will be watched over.

This Ethical Code must be accepted by anyone who forms part of Ferrer's organisational structure as a previous requirement to their incorporation. It contains a protocol of action in the case of non-compliance, which will be applicable if any infraction of the ethical principles contained in this manual occurs.



# AREA OF APPLICATION

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This Ethical Code is applicable to:

- All Ferrer's companies, as well as the participating societies over which it has effective control.
- The entire organisation, including the administrative and control bodies, the top management and all the staff.
- The activities that Ferrer carries out in any geographical area.



# CORRUPTION

## PUBLIC CORRUPTION

Ferrer bases its relationships with the public sector on the principles of transparency and equal opportunities, and rules out any action aimed at obtaining an advantage over market competition or in public contracts based on an illegal action.

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Therefore, authorities, people holding positions or civil servants may not be favoured or offered gifts or any kind of economic or patrimonial benefit aimed at obtaining any kind of advantage in Ferrer's favour. Nor may it accept any offer by people holding positions or civil servants to carry out actions in favour of Ferrer.

## PRIVATE CORRUPTION

Ferrer bases its action on the market and the relationships with its clients, suppliers and competitors on the principles of free competition and equal opportunities, ruling out any action aimed at obtaining an advantage on the market or in contracts with its clients and suppliers that are based on an illicit action.

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Therefore, people who hold positions with decision-making capacities in other companies may not be offered or favoured with money, gifts or any other economic or patrimonial benefit aimed at obtaining any kind of advantage in Ferrer's favour. Nor may the request for or acceptance of the offering by any person with a position to carry out actions in favour of the company in exchange for an economic or patrimonial advantage be considered.



## **INFLUENCE PEDDLING**

Influence peddling is considered to be any action or strategy which has the objective of guiding or influencing the action of a person holding a position, a civil servant or an authority by exploiting their personal relationship with this person or with any other civil servant or authority to obtain a resolution that could, directly or indirectly, generate an economic benefit or prevent a loss of any kind to the company itself or to a third party.

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No activity may be carried out that could be considered influence peddling, as detailed above.

## **RELATIONSHIP WITH POLITICAL PARTIES**

The company may have a relationship with political parties within the framework of what is established in the legislation of the countries in which it acts and in compliance, at all times, with the national laws in matters of political party funding.

## **CONFLICT OF INTERESTS**

A conflict of interest is considered to be a situation in which an action or business decision could be influenced by a particular interest of a person or persons at Ferrer who participate in it, or of a third party with whom they have a personal link.

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All the people at Ferrer will only consider the interests of Ferrer and, therefore, will abstain from carrying out any private activity or one of mere personal interest that could involve the appearance of conflicts of interest.

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These prohibitions will also be applicable if the person who benefits from the acts or the activities that are forbidden is a person linked to the person at Ferrer who carries them out.

# **DONATIONS, FUNDING, SPONSORSHIP AND PATRONAGE**

Ferrer contributes to the development of the communities with which it relates, by means of donations, funding, sponsorship and patronage of projects with a social, cultural or scientific content.

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In keeping with this commitment, any donation, financing, sponsorship or patronage carried out must:

- Count on the internal and, if relevant, external authorisations that are required.
  - Be made to associations that have a suitable organisational structure to guarantee the correct administration of the resources.
  - Be faithfully reflected in the accounting records.
  - Not be used as a means to cover up a wrongful payment or bribery.
  - In addition, donations made to the aforementioned institutions must be done transparently and there must be a follow-up carried out on them to ensure that they are used for the established purposes.
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Donations may not be given to health professionals on an individual basis, except for the collaboration or sponsorship for them to attend events and meetings as envisaged by the codes of conduct of the country in which they carry out their profession.

## **GIFTS, PRESENTS OR COMMERCIAL INCENTIVES**

As a general rule, gifts or presents may neither be given nor accepted during the exercise of our professional activities. Exceptionally, and as long as they are not forbidden by current legislation, they are allowed when they correspond to signs of courtesy or to usual commercial details.

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In any case, gifts or presents must never be conditioned to obtaining a specific results and must never be the result of an act or decision adopted by the person to whom they are given.

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If the receiver is a health professional, we must also adhere to the codes of conduct that are applicable in the country where they carry out their profession.

## **COMMERCIAL AND PROMOTIONAL SAMPLES**

The delivery of samples related to human health and animal health (medicinal products, children's food products, health products, cosmetics, etc.) will follow what is established by current regulations in each case.

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For other products, commercial samples will not be considered to be gifts. Clients, potential clients and distributors may be given samples of products to assess their quality and use.

## **FACILITATION PAYMENTS OR PROCEDURE PAYMENTS**

In the case of measures of introduction, commercialisation or implantation in foreign countries, no payments or gifts aimed at civil servants of these countries may be made to facilitate an administrative procedure, obtain an importation licence or permit, a favour or service of any other nature.

## **TRAVEL AND REPRESENTATION EXPENSES**

Staff travel and representation expenses may not be used to cover up bonuses to clients, suppliers, collaborators or health professionals.

## **RELATIONSHIP WITH THIRD PARTIES\***

The hiring process of third parties shall be developed with impartiality and objectivity, meaning that criteria of cost and quality must be applied to these processes.

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Ferrer shall promote knowledge of and compliance with this Ethical Code and, where relevant, of the regulations that develop it, and the adoption of behaviour guidelines that are consistent with it.

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Ferrer shall establish a control over these third parties which will be proportional to the level of risk that they have in relation to the crime of corruption.

*\* Suppliers, distributors, collaborating companies and participating companies over which Ferrer does not have effective control.*



# COLLECTIVE SECURITY AND PUBLIC HEALTH

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Ferrer has the control over any activity or product that may, directly or indirectly, create a risk to collective safety and public health, due to the toxic nature of its components or any other threat to people.

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It also has a pharmacovigilance system set up to guarantee the correct, efficient and safe use of its products, with the aim of improving the health and well-being of patients as well as facilitating the activity of health professionals, thereby contributing to the optimisation of public security and health.

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Ferrer shall watch over the protection of its patients and consumers and against the falsification and manipulation of its products, as this could be dangerous for its consumers, its reputation and public health in general.

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All the staff shall watch over compliance with all these aspects while carrying out their professional activities.



# RESPECT FOR PEOPLE

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Ferrer respects the internationally recognised human rights of the Universal Declaration of Human Rights and the principles relating to the rights established in the Declaration of the International Labour Organization.

## RIGHT TO EQUALITY

The work relationships at Ferrer are based on the principles of mutual respect and equality of treatment and opportunities.

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Therefore, no kind of discrimination against any person shall be accepted due to their ideology, religion or beliefs, origin, gender, sexual orientation, family situation, illness or disability.

## RIGHT TO PRIVACY

Ferrer shall respect and protect the privacy of people who provide their personal data and information of a reserved nature.

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Ferrer shall control the channels by means of which it obtains data of a personal nature and shall ensure that it complies with applicable regulations. This data shall be preserved in keeping with the security measures that correspond to its nature.

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The reviews and inspections derived from any reported infringements of this Ethical Code shall be made following a protocol that guarantees respect to the privacy and dignity of the people affected.

## **SAFETY AT WORK**

The health, safety and well-being of people are fundamental to Ferrer. Therefore, as part of the organisation, the creation of the most suitable work conditions so that Ferrer shall be considered a Healthy Workplace, as established by the World Health Organisation, shall be promoted.

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All the work to be carried out by the staff at Ferrer in its own facilities or in those of third parties shall comply with the safety conditions required by the regulations on workplace risk management. In addition, Ferrer shall watch over compliance with this regulation by those who visit its facilities.

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Ferrer is obliged to set up the safety measures required by law and everybody is obliged to respect them, meaning that no safety or ergonomic measure implanted at the workplace may be removed or neutralised.

## **LABOUR RIGHTS**

Under no circumstances shall labour conditions or those of Social Security be imposed that prejudice, suppress or restrict the rights which are recognised for the staff by legal dispositions, collective-bargaining agreements or individual contracts.

## **CONCILIATION BETWEEN FAMILY LIFE AND WORK**

Ferrer shall try to facilitate conciliation between working in the company and the personal and family life of all the people of which it is made up.



# MARKET AND CONSUMERS

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Ferrer bases its action on the market on the principles of free competition and equal opportunities and rules out any action aimed at obtaining a benefit, use or disloyal or illegitimate advantage over other clients, suppliers, competitors and other market stakeholders.

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Therefore, the following actions or behaviours shall be forbidden:

- Unauthorised access to confidential information pertaining to other companies.
- Industrial espionage.
- Revealing business secrets.
- The use of its own or external inside information for any kind of transaction or business.
- Deceptive advertising.
- Deception, fraud and swindles of any kind.
- The dissemination of false rumours about products, services, market conditions, etc.
- Manoeuvres to alter the prices of the products of third parties.
- Manoeuvres to alter the stock exchange rate or the value of the company.
- Manipulation of public calls for tenders.
- Falsification of methods of payment.
- Manoeuvres to lead the company to a situation of insolvency to evade creditors.





# FINANCE, TAX AND SOCIAL SECURITY

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Ferrer shall comply with its obligations in tax and Social Security matters.

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Ferrer's accounts must faithfully reflect the economic-financial situation of the company.

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Ferrer shall establish suitable procedures and controls to prevent any client or supplier from trying to use Ferrer's structure for a money-laundering operation.

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Ferrer shall not, as a general rule, make payments in cash. If the use of cash is necessary, a detailed record of the payments made in cash shall be kept.

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Ferrer shall be transparent with respect to the subventions it receives. It may not use false or misleading information to obtain subventions, tax relief or any other kind of aid or advantages.



# ENVIRONMENT

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Ferrer is firmly committed to the protection, preservation and improvement of the environment and of the natural capital. Therefore it develops its activities through the sustainable management of the natural resources and the minimisation of its environmental footprint in the various stages of the life cycle, promoting eco-innovation and leading a process of change towards a circular economy model.



# INTELLECTUAL AND INDUSTRIAL PROPERTY

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Ferrer, in its commitment to promote creativity and innovation for the development of products that contribute to the well-being of society, will watch over protection of its own intangible assets as well as those of third parties.

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Therefore, without the due previous authorisation, it shall not permit the copy or reproduction, in full or partially, of intangible assets of third parties, or transformation or modification, in full or partially, or the importation or distribution of these assets.

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Industrial secrets, brands, patents, industrial designs, domain names, books, videos, musical works, typographies, advertising campaigns, slogans, brochures, catalogues, documents, speeches, presentations, reports, studies, drawings, graphs, paintings, comics, projects, plans, maps, models, architectural or engineering designs, computer programs and any other protected work shall come into the category of assets protected by intellectual copyright even if the *copyright* or *all rights reserved* symbol do not appear.

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All the programs installed in the computers and mobile devices of Ferrer shall have their corresponding licence to use.



# COMPUTER SECURITY

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Ferrer shall watch over the prevention and control of crimes that may be committed by use of information technologies.

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Ferrer has a rule that governs in detail the use of corporate information and communication technology resources by internal as well as external users.

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Among these crimes, which constitute actions that are forbidden in Ferrer, we would mention the following:

- Unauthorised access to the computer systems of competitors, clients, or any other company or public or private organisation.
- Dissemination of viruses or programs that could cause damage to tangible or intangible assets.
- Denial-of-service attacks.
- Manipulation of e-auctions.
- Any other kind of computer damages, including sabotage or the simple alteration of the data or information contained in a third party computer system.
- E-fraud, including phishing and pharming and any kind of fraud based on the use of computer technologies or social engineering.
- Dissemination of rumours, criticism and boycotts via the Internet and social networks, including retweets and forwarding messages of any kind.
- Industrial espionage by means of the Internet.
- The register of domains using third-party brands and business names.
- Child pornography.



# URBAN PLANNING

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Ferrer shall manage its properties, property operations and construction, edification and urbanisation initiatives, respecting urban planning and current regulations.

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Ferrer shall not carry out unauthorised urbanisation, construction or edification work on land assigned to highways, green areas, public property or places that have their landscape, ecological, artistic, historical or cultural value legally or administratively recognised or which, for the same reasons, have been considered to be areas of special protection.



# COMPLAINTS AND QUERIES CHANNEL

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Ferrer has a Complaints and Queries Channel which will enable all the staff to send in queries about this Ethical Code in full confidence, as well as to report possible infringements or violations of it .

[www.tagferrer.com/ethicalcode](http://www.tagferrer.com/ethicalcode)



Ecological footprint per unit:



Weight of the publication: 260.45 g



Carbon footprint: 843 g CO<sub>2</sub>e



Waste generated: 720 g



Water consumption: 24 L



Energy consumption: 13.06 MJ



Consumption of raw materials: 313 g

