



cantabria labs
celebrate life

CODE OF CONDUCT

MAY 2018

Table of contents

1 FOREWORD	2
2 COMMITMENT	3
3 EQUAL OPPORTUNITIES, HARASSMENT.....	4
4 CONFLICTS OF INTEREST.....	5
5 HEALTH, SAFETY AND HYGIENE IN THE WORKPLACE.....	6
6 RELATIONS WITH HEALTH PROFESSIONALS.....	7
7 SEARCH FOR EXCELLENCE.....	8
8 RELATIONS WITH POLITICAL PARTIES AND PUBLIC ADMINISTRATIONS.....	9
9 TRACEABILITY AND FILE RETENTION.....	10
10 RESPECT FOR THE ENVIRONMENT.....	11
11 USE OF TECHNOLOGICAL RECOURSE AND SAFETY OF INFORMATION.....	12
12 BUSINESS REPORTING	13
13 COMMITMENT WITH THE TRUTH.....	14
14 COMMUNITY RELATIONS.....	15
15 ETHICS CHANNEL	16



1 FOREWORD

Cantabria Labs operates worldwide in a wide variety of activities, including research, manufacture, marketing and sales. These activities are subject to legal and ethical standards, some of which are exclusive to the healthcare industry.

Therefore, we wish to share with you this Code of Conduct in order to convey the values and principles that we hope will inspire our behaviour whilst undertaking our work and in our relationships with third parties, striving to be exemplary, beyond simple legality.

Today, we must link classical concepts of “brand”, “notoriety” or “price” with those of “behaviour”, “transparency”, “responsibility” and “trust”, in short, our commitment with full respect of the standards and legality that society and therefore our customers demand from businesses.

If we want CL to continue to be a market leader and the favourite option of our customers when choosing their products, our aim must be our firm commitment with sustainable business development, respectful of society, the environment, people’s rights and current legislation.

We believe that success comes from striking a balance between making money and doing the right thing, between science and ethics and between personal initiative and collect expertise. It is simple: if we do the right thing and we do it together, we will do it well.

I invite you to read this carefully, we are at your disposal to resolve any queries you may have regarding this.

Many thanks for your input and for being a fine example of our values and principles.

CONCEPCIÓN MATJI
CHIEF COMPLIANCE OFFICER and DIRECTOR



2 COMMITMENT

Cantabria Labs and all who form part of it, endeavour to respect the standards and provisions of this code and the policies that emanate from it and to maintain a collaborative and transparent relationship with the Compliance Committee.

By working in the development, manufacture and marketing of healthcare products, our commitment with continued improvements in quality and safety standards is somewhat fundamental, whereby all our products are the result of many hours of work, resources and quality tests by our employees.

Those who work at Cantabria Labs are obliged to fulfil company guidelines, actively cooperating and sharing the principles and standards of this code and other company policies. We also come to expect this ethical standard from external collaborators regardless of our legal relationship with them.

Consequently, all the actions that we carry out must be presided over by the principles of loyalty and good faith with the company, customers, society and other people or groups with whom we have dealings.



3 EQUAL OPPORTUNITIES, HARASSMENT

Our most important assets are each and every individual that forms Cantabria Labs.

We are a company committed to integrity, dignity and tolerance in the workplace, therefore behaviour such as bullying, violence or intimidation is unacceptable.

The commitment of Cantabria Labs is to promote a work environment in which every worker is respected regardless of race, sex, sexual orientation, religious belief or any other personal characteristic.

Inappropriate sexual conduct or propositions, as well as any other denigrating or bullying behaviour among employees for whatever reason, are completely prohibited. The Compliance Committee shall take the disciplinary and necessary legal measures to eradicate this behaviour if it occurs as it is contrary to the spirit of Cantabria Labs.

In accordance with that set forth in section 15 of this Code, Cantabria Labs guarantees that no claims for any of the aforementioned reasons and made in good faith shall receive any reprisal.

Furthermore, we are committed to the in-depth investigation of any complaints received and to lending our support and all the help necessary for the complainants.



4 CONFLICTS OF INTEREST

At **Cantabria Labs** we respect the right of our employees to manage their personal investments and those of their families freely and as deemed fit. Employees, however, must avoid situations or commercial activities, which may give rise to a conflict between their personal interests and those of **Cantabria Labs**.

Therefore, all of us at **Cantabria Labs**, should avoid any personal investment or activity that may interfere with the Company's interests. As far as possible, we must also avoid our direct family from having interests with suppliers, clients, competitors or other business partners of **Cantabria Labs**. In pursuit of transparency and if in doubt over any such conflict, we must inform the Compliance Committee, which shall study it and shall determine how to proceed in each case.



5 HEALTH, SAFETY AND HYGIENE

At Cantabria Labs we believe that good working conditions are fundamental, therefore, we are deeply committed to the compliance of all regulatory measures on safety in the workplace, occupational risk prevention and the necessary control measures, to be able to offer a healthy, clean and safe working environment.

At **Cantabria Labs** we are committed to provide all of our employees with the appropriate personal protection equipment for the tasks that they must carry out and those who breach the control and safety measures will not be permitted to carry out said tasks.

We also support the importance of training on matters of occupational risk prevention, health and safety for all workers to achieve a safe and healthy working environment for all.

6 RELATIONS WITH HEALTH PROFESSIONALS

Product research and improvements are key elements for the growth of **Cantabria Labs**. Therefore, relations with healthcare professionals are a fundamental pillar of our business development, through their input on improving the efficacy and efficiency of our products from their initial development until reaching the patient.

In this way, it is especially relevant for **Cantabria Labs** to regulate relationships and action guidelines with these professionals.

At **Cantabria Labs** it is expressly prohibited to offer or pay amounts of money in exchange for the prescription of our products to the detriment of competition and for professional reasons.

Only commercial materials, product samples or gift items of a low or token value may be given and which are directly related with the brand or prescription of the product.

As relationships struck with healthcare professional often go beyond the professional sphere, social relationships or friendships must be differentiated from professional association, regulated by this Code of Conduct and adjusted to these provisions.

In its commitment to promote and collaborate with research and development, **Cantabria Labs** may organise, cover the costs or collaborate with events, training activities and studies in which professionals from the medical, pharmaceutical or cosmetic sector take part. It may also subsidise the costs derived from such events, actions or studies provided that the costs and related hospitalities are for a proportionate amount.

7 SEARCH FOR EXCELLENCE

Cantabria Labs undertakes to promote the wellbeing of patients, performing its activities in accordance with the ethical criteria of professionalism and responsibility.

We are aware that we provide our service in an extremely regulated market due to which the product that we market could have a detrimental effect on the health of individuals if handled incorrectly.

Therefore, we ensure that each and every product that we market complies with national and international quality standards and with a level of excellence proposed by the company, further to strict control in the manufacturing process and with starting materials of maximum quality.

At **Cantabria Labs** we know that the satisfaction of families and individuals who acquire our products is one of our main assets and our greatest value for the future. Hence, the reliability and accessibility of our products and our brand constitute autonomous values that must be reaffirmed each time, providing personalised and specific solutions to the particular circumstances and needs of our customers.

Our desire is not simply “to be” on the market, but we wish to remain at the forefront, ahead of the times and avoiding routine, so that the innovation of our formulas and development of our products offer effective solutions to the problems of our customers.

At the same time, our responsibility requires us to achieve all these objectives responsibly, combatting all types of fraud. The fraudster is not innocuous, causes general harm to the company, its prestige, workers, customers and the community.

8 RELATIONS WITH POLITICAL PARTIES AND PUBLIC ADMINISTRATIONS

As a company, **Cantabria Labs** maintains a neutral and respectful political stance with democratic principles.

As regards its employees, Cantabria Labs has no objection in them participating in public and/or organisational life, provided that they do so in a personal capacity, outside of working hours and without involving **Cantabria Labs** in any way.

As a company, **Cantabria Labs** is totally prohibited from making any kind of cash donation, in kind or any other type to political parties.

As regards relations with Public Administrations, at **Cantabria Labs** we are limited to those that are necessary for the normal development of our activity.

We expressly prohibit the offering of any type of gift or favour, of any type, to any member of a public administration body in exchange for special treatment for the Company.

Such behaviour would incur the corresponding disciplinary sanctions and the facts reported to the competent administrative and legal authorities.



9 TRACEABILITY AND RETENTION OF FILES

It is important to highlight that at **Cantabria Labs** we are not merely concerned that applicable regulations are fulfilled, but also that they are done so effectively and efficiently and with documentary proof or of any type, of the decisions taken and that are significant for the company's development and its objectives, as well as regulatory compliance thereof.

10 RESPECT FOR THE ENVIRONMENT

At **Cantabria Labs** we are aware of the importance of the effective and efficient use of natural resources and of the vital importance of their care and respect. Therefore, we are conscious that the work we carry out generates waste that is potentially harmful to the environment, we adopt a series of measures and behaviour to minimise these risks as much as possible.

Therefore, everyone at **Cantabria Labs** must follow and respect all internal regulations on matters of environmental protection and disposal of contaminant waste.

We undertake to comply with legislation in force and the environmental standards and we trust in specialist companies to carry out the more delicate activities of waste disposal.

Furthermore, at **Cantabria Labs** we promote energy saving at all our facilities and the responsible use of natural resources.

11 USE OF TECHNOLOGY RESOURCES AND SAFETY OF INFORMATION

Our work within a specialised field requires the use of general and specific technological resources. Therefore, we have the necessary resources to help develop our work and achieve our objectives, requiring diligence and good faith from all in their use.

The technological resources available are for use in the work place and for the execution of the functions of each individual. Conduct contrary to internal standards or current legislation shall not be tolerated under any circumstances.

We may make rational personal use of them, as long as it does not interfere in our responsibilities and productivity or in those of others, or in general matters of the company, and with the express authorisation of our superiors or those responsible for said resources.

The download of rights protected material of third parties is expressly prohibited, as well as visiting websites or areas that may compromise the security of the technological resources or information of **Cantabria Labs** and furthermore violate current legislation on matters of privacy and personal data protection and decorum in labour relations.

We shall always respect the confidentiality and security of information clauses signed in the contracts of Company employees.



12 BUSINESS REPORTING

At **Cantabria Labs** we undertake to provide legally-required, accurate and precise information to the markets and competent authorities.

The more accurate and reliable the information that we provide to the market, the greater security we offer to third parties, making **Cantabria Labs** a reference of transparency, trust and reliability.

Therefore, we guarantee that the accounting, ledgers and fiscal registers reflect the true image of the company.

We pledge our commitment in collaborating with public administrations through our internal management standards for inspections and audits.

Beyond the control of the various administrations over our accounts or other sections of our business, **Cantabria Labs** carried out annual audits of its accounts to verify the compliance of all the existing legal obligations.

13 COMMITMENT WITH THE TRUTH

At **Cantabria Labs** we give special importance to the company's image that is transmitted to the outside world and the publicity and advertising of our products, as it is the window through which our customers see our products, their properties and functions.

We are committed to the truth in what we publish, whether in materials, advertisements, advertising campaigns, marketing and training, as well as in the information that we include on the labelling and/or packaging of each product that we launch to market. Therefore, before that information becomes public, we are subject to a series of filters to corroborate and check its veracity, that is corresponds to reality and does not betray the trust that our customers place in us.



14 COMMUNITY RELATIONS

At **Cantabria Labs** we demonstrate our commitment with society and the integration of disadvantaged individuals and our desire to collaborate with the community, through the collaboration in different charitable projects with a large number of foundations, making both financial and product donations, and supporting different campaigns for social awareness.

15 ETHICS CHANNEL

We have a communication channel so that we may, in confidence, ask any questions, make any suggestions, warn of an incident in the application of this Code of Conduct or report any suspicion or illicit behaviour that we may know.

The communications received shall be assessed and treated confidentially. Our details shall be processed in accordance with applicable data protection regulations.

Any reprisal against anyone who uses the channel to report possible irregularities in good faith is strictly prohibited.

Breach of the regulations contained in this Code of Conduct may lead to the implementation of the corresponding internal disciplinary proceedings and, according to the seriousness, may be reported to the corresponding labour authorities, according to that set forth on this matter by the collective agreement in force as well as by the Statute of Workers.

In case of more serious breach, said conduct could be reported to the administrative and legal authorities.

Edition	Sections that change	Description of change	Date
V. 01	Original Document		MAY 2018