Palex Improving technologies
Improving lives



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Code of Conduct for suppliers

Palex

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I Introduction

At Palex, our motto is **"Improving Technologies, Improving Lives".**

We believe that health matters the most – that is why our purpose is to support healthcare professionals with access to customized technological innovations that help improve patients' lives.

Upholding ethics, integrity, sustainability, and compliance in all aspects of our operations is central to achieving this purpose. This commitment extends across all companies within the Palex Group and applies to all regions and activities.

Suppliers are an extension of our business.

Our shared purpose relies on a responsible and transparent supply chain, which is why we expect our suppliers to fully embrace these standards, conduct their operations responsibly, and collaborate with us to uphold the principles set out in this Code of Conduct (the "Principles").

By working together in this way, we create a sustainable and ethical supply chain that supports our shared mission of improving technologies and improving lives.

This Code of Conduct sets out the minimum standards and Principles that Palex expects from its suppliers to govern their conduct throughout the duration of the business relationship.

The Code of Conduct does not replace the law. In addition to the Principles contained herein, Palex expects its suppliers to comply with all applicable laws, rules, and regulations.

Palex may disqualify any potential supplier or end the relationship with current suppliers that fail to comply with the Principles.

II The Principles

The Principles define the core standards and expectations that should guide the conduct of all our suppliers. They provide a framework for ethical, responsible, and compliant behavior across all areas of our supply chain.

2.1 Ethics and Legal Compliance

All Palex suppliers are expected to conduct themselves in accordance with principles of ethics, integrity and legality in all their business activities. As such, they shall:

Comply with all applicable laws and regulations. Any illegal practices or activities that violate these laws must be strongly avoided. This commitment must be upheld not only by the supplier itself but also by all its employees and representatives. Suppliers are also expected to conduct themselves in accordance with generally accepted industry standards.

Implement a zero-tolerance policy towards corruption and bribery. Suppliers are required to comply with all applicable anti-corruption and anti-bribery laws. Suppliers must not make, promise, offer, or authorize any form of improper payment, kickback, facilitation payment, or other undue influence or benefit intended to inappropriately influence the decisions of any stakeholder, including Palex employees or representatives. In particular, suppliers should not offer any kind of gifts, entertainment or personal benefit which could be perceived as a bribe or improper influence. Political contributions must be limited and only when expressly permitted by law.

Avoid and report conflicts of interest. Suppliers must avoid any situation where personal, financial, or other interests could be conflict of interest, or appear to be conflict of interest, affecting Palex. Any potential or actual conflict of interest should be disclosed immediately to Palex, and appropriate measures must be taken to manage or eliminate the conflict.

Engage ethically with healthcare professionals and organizations. Suppliers must maintain professional and transparent interactions with healthcare professionals and organizations, avoiding any behavior that could be perceived as improper influence, undue benefit, or conflict of interest. For interactions with a higher risk of being perceived as undue influence, suppliers should keep appropriate records and seek to establish internal approval processes involving independent functions such as Compliance, Audit, Legal, or Finance.

Maintain the accuracy and integrity of records and reporting. Suppliers must ensure that all records, books, and reports are accurate, complete, and transparent. Falsification, misrepresentation, or omission of information with respect to Palex business is strictly prohibited.





2.2 Adequate market practices

Palex recognizes that its mission can only be achieved in a marketplace guided by integrity, fair competition, and respect for trade regulations. Our suppliers play a critical role in upholding these standards, and we expect them to:

Ensure fair competition. Suppliers are expected to compete fairly and comply with all applicable competition and antitrust laws. Anti-competitive agreements, price-fixing, market sharing, or any other practices that distort fair competition are strictly prohibited.

Respect and comply with international trade sanctions and controls. Suppliers must comply with all applicable trade control laws, import/export regulations, and economic or trade sanctions imposed by governments and international bodies.



This includes ensuring that products, services, or technology are not supplied to prohibited parties or countries. In addition, suppliers shall immediately inform Palex of any possible trade sanction or restriction affecting them.

Prevent money laundering and terrorist financing. Suppliers must comply with all applicable anti-money laundering and counter-terrorist financing laws and regulations. Suppliers must ensure that all assets involved in transactions with Palex have a lawful and legitimate origin.

Manage third-party relationships responsibly and assess risks in their supply chain. Suppliers should evaluate the alignment of their partners and subcontractors with its standards, ensuring that third parties act in a manner consistent with ethical, legal, and sustainability standards.

Promote products transparently and accurately. This includes ensuring that all marketing, advertising, and promotional activities are truthful, not misleading, documented, and compliant with applicable laws, regulations, and industry codes.

Ensure product safety, quality, and timely reporting of adverse events. Our suppliers are expected to ensure that all products and services are safe for their intended purpose, perform reliably, and comply with all applicable legal and regulatory requirements. This includes maintaining appropriate controls over components, labeling, expiration dates, instructions for use, and overall product integrity. Suppliers must also establish mechanisms to identify, document, and promptly communicate any quality or safety concerns to Palex, and fully cooperate in investigations, corrective actions, or recalls when necessary.

Respect intellectual and industrial property rights. Suppliers must respect third party intellectual and industrial property rights at all times. Suppliers shall not use counterfeit goods, and must maintain valid licenses for all protected products and components.





2.3 Human rights, fair labor and animal welfare

Respect for human dignity, fundamental rights, and ethical treatment of all individuals and animals is a core value at Palex. Suppliers are expected to uphold these principles throughout their operations and supply chains, promoting safe, fair, and responsible practices.

Ensure the utmost respect for human rights and an absolute ban on child labor, human trafficking, and modern slavery throughout the supply chain. Suppliers are expected to demonstrate the highest commitment to this principle, and any actions contrary to it are not acceptable.

Strict compliance with fair working conditions and labor practices. Suppliers should provide fair and lawful working conditions, including appropriate wages, reasonable working hours, benefits, and the right for employees to freely associate in accordance with applicable laws.

Uphold health and safety standards and promote employee well-being. Suppliers are expected to always comply with all applicable health and safety requirements to provide a secure working environment. In addition, suppliers should actively promote the physical and mental well-being of their employees through supportive practices and initiatives.

Implement a zero-tolerance policy for discrimination and harassment and ensure fair treatment and equal opportunities. Suppliers shall provide an inclusive workplace free from discrimination or harassment based on race, gender, religion, age, disability, sexual orientation, or any other equivalent characteristic, and ensure equal opportunities for all employees.

Promote animal welfare. Suppliers are expected to treat animals involved in their supply chain ethically, minimizing any pain or stress, and apply the same responsibility when sourcing animal-based materials, ensuring compliance with applicable laws and recognized best practices.

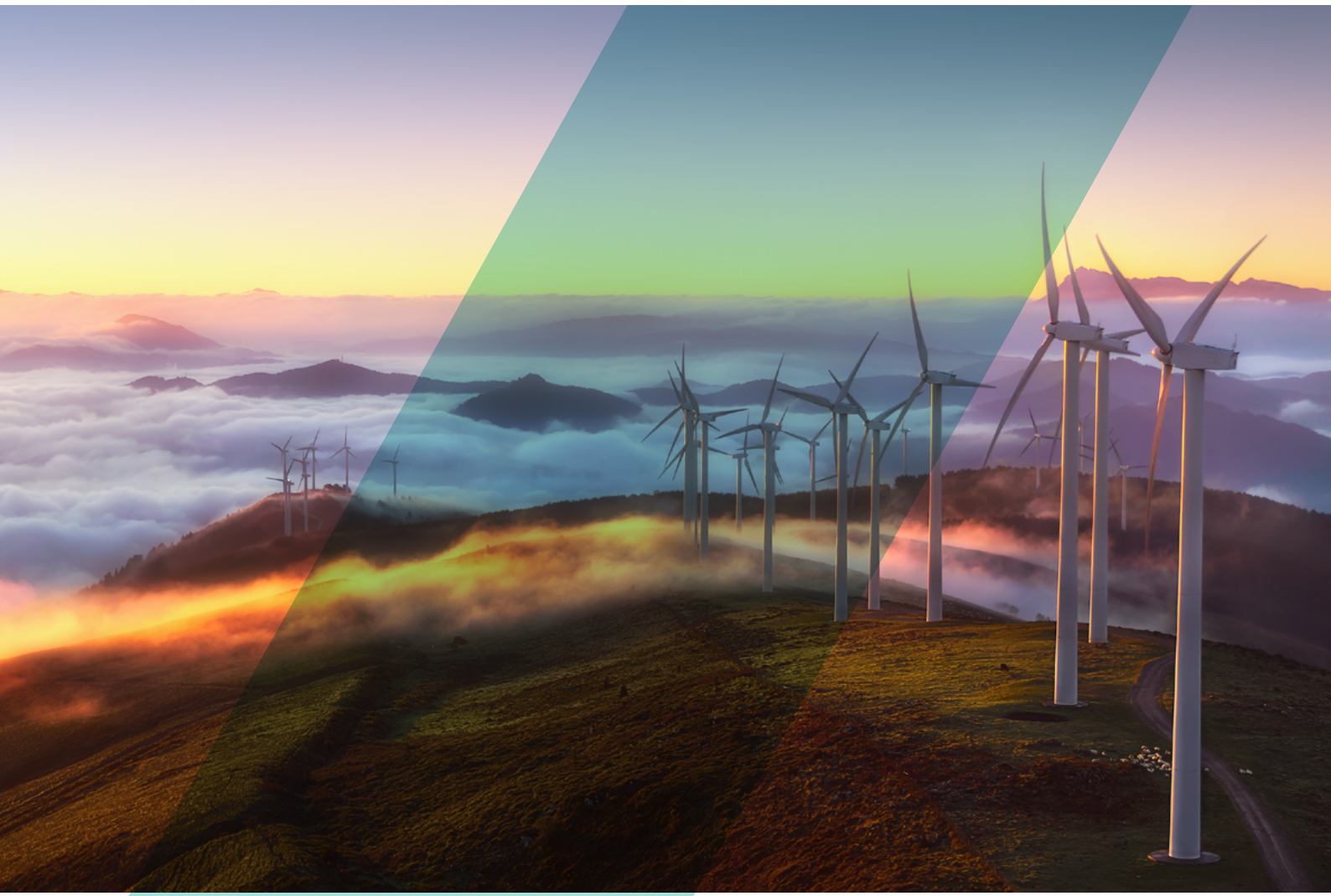
2.4 Environmental responsibility

At Palex, we recognize that the health of our environment is inseparable from the health of its people. Suppliers are expected to conduct their operations responsibly, minimizing environmental impact and supporting sustainable practices. As such, we expect our suppliers to:

Comply with all applicable environmental laws and regulations. Suppliers must ensure that their operations comply with all applicable environmental laws and regulations, minimizing harmful practices for the environment or public health.

Manage waste, control emissions, prevent pollution, and use resources efficiently, including energy, water, and materials. We expect suppliers to implement effective measures to minimize environmental impact, reduce consumption, improve efficiency, and limit their overall environmental footprint.

Source materials responsibly and promote supply chain sustainability. At Palex, we actively seek to promote sustainability in our own operations and supply chain. In the same way, we expect our suppliers to adopt responsible sourcing practices and to extend these principles throughout their own value chains.



2.5 Data privacy and confidentiality



Respect for privacy and protection of information are fundamental to building trust and maintaining business relationships. When handling personal data or confidential information we expect our suppliers to:

Protect personal data and handle it responsibly and lawfully. Suppliers must ensure that all personal data – whether related to patients, healthcare professionals, employees, or business partners – is collected and processed according to the applicable data protection laws such as the EU General Data Protection Regulation (GDPR) or equivalent local legislation.

Safeguard confidential information and trade secrets. Suppliers must protect all non-public information obtained through their relationship with Palex, including technical data, pricing, strategies, business strategy, and other sensitive information.

Ensure information security. Suppliers shall implement appropiate technical and organizational measures aimed at ensuring information security, maintain an incident response process and promptly notify Palex of any confirmed or suspected security incident.

2.6 Raising concerns

Palex is committed to fostering a culture of open communication, transparency, and accountability. Suppliers play a critical role in upholding these values and are well positioned to identify any irregularities in the course of their business relationship with Palex. We therefore expect our suppliers **to report to Palex any irregularities or breaches of the Principles.**

Palex provides an Internal Information System (whistleblowing channel) accessible via https://palex.report2box.com, through which suppliers can report any suspected irregularities. Palex guarantees the highest level of confidentiality in handling and processing all communications received through this channel. No retaliation or adverse consequences of any kind will be taken against individuals who report a potential breach in good faith.

Alternatively, suppliers may contact Palex directly through their primary business contact or via Palex compliance email at compliance.support@palex.es.



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1

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Initial version of the document.



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