CODE OF ETHICS AND CONDUCT OF AGEM AUXILIAR GENERAL DE ELECTROMEDICINA, S.L.

1. Introduction and purpose

This Code of Ethics and Conduct (hereinafter, “the Code”) constitutes the **internal regulatory framework** through which AGEM Auxiliar General de Electromedicina, S.L. (hereinafter, “AGEM”), together with its subsidiary companies forming the Group, for Compliance purposes only, expressly states its institutional commitment to legality, business ethics and criminal regulatory compliance. The primary purpose of this instrument is to consolidate an **organisational culture** based on integrity, responsibility and transparency, setting common standards of conduct enforceable on all members of the organisation, including its governing bodies, executives, employees, subsidiaries and contractually linked third parties.

For the purpose of determining the scope of the Group's companies, the following are referred to:

- AGEM, S.L.
- GRUPO AGEM, S.L.
- HER BIOMEDICAL, S.L.
- EDETRA ANGOLA
- AGEM ANGOLA
- AGEM GUINEA, S.A.
- AGEM KZ
- MA GLOBAL MOROCCO
- GRUPO BOLIVIA BRANCH
- GRUPO MOZAMBIQUE SUBSIDIARY
- LINMED TRADE S.L.

As stated, for Compliance purposes only, any reference in this text to AGEM, as will likewise be incorporated in the remaining relevant Policies, shall be understood to encompass all of the above-mentioned companies.

The Code forms part of the Criminal Compliance management system promoted by AGEM in accordance with the standards established in **UNE Standard 19601:2025** and in line with the provisions of **Article 31 bis of the Criminal Code**, acting as a self-regulatory instrument that contributes to the prevention, detection and response to potential criminal risks.

2. Guiding principles and values

AGEM structures its activity in accordance with a set of **ethical principles and corporate values** that form the basis of its governance and compliance model, among which the following stand out:

- Unrestricted respect for the law in force in all jurisdictions in which it operates.
- **Zero tolerance** for any manifestation of corruption, fraud or criminal conduct.
- Professional integrity and honesty in decision-making.
- Transparency in internal processes and in relationships with third parties.
- Respect for the fundamental rights of individuals, equal treatment and diversity.
- Environmental protection and the promotion of sustainability.

These principles not only inspire this Code but also guide all AGEM's actions, shaping the expected conduct of all its members.

3. Subjective and objective scope of application

The Code of Ethics is **binding** and mandatory for:

- Members of the governing body.
- Executive staff and employees of all areas and hierarchical levels.
- Subsidiaries and international branches.
- Individuals or legal entities that act on behalf of AGEM or that maintain a commercial, contractual or professional relationship with the organisation, provided that the nature of the relationship allows it.

It is also established as an obligation of the linked parties to expressly communicate this Code to their respective collaborators, subcontractors or intervening entities.

4. General rules of ethical and professional conduct

All AGEM members must observe, in the exercise of their duties and in their professional relationships, exemplary ethical conduct, respectful of applicable regulations and aligned with the corporate values defined. In particular:

4.1. Regulatory compliance

Obligated parties must act in accordance with national and international law, sector regulatory provisions, internal protocols and manuals, and recognised best ethical practices in the business field.

4.2. Relations with third parties

Interaction with suppliers, customers, authorities and other stakeholders must be based on criteria of legality, fairness, good faith and transparency. The following are expressly prohibited:

- The promise, delivery, acceptance or request of any type of incentive, benefit, gift or improper advantage that could alter objectivity or influence professional decisions.
- The use of intermediaries for the purpose of concealing irregular practices.

4.3. Conflicts of interest

Employees and executives must avoid situations in which their personal or family interests, or those of third parties with whom they have ties, could interfere or clash with AGEM's interests. They must immediately inform the organisation of any circumstance that could be perceived as a conflict of interest.

4.4. Confidentiality and information protection

All information accessed in the course of professional activity must be treated as confidential, unless it is in the public domain or there is a legal obligation to disclose it. Strict compliance with personal data protection regulations will likewise be guaranteed.

4.5. Environmental responsibility and social commitment

AGEM will promote the adoption of good environmental practices, the minimisation of ecological impact and sustainable development. It will likewise promote inclusion, fairness and social responsibility in its labour and community relations.

5. Prevention of criminal risks

AGEM recognises the importance of adopting a proactive stance in preventing the commission of offences, particularly those that could be attributable to the legal entity. Among the risks identified as priorities are:

- Corporate corruption offences, active or passive bribery.
- Money laundering or terrorist financing offences.
- Criminal tax infringements.
- Fraud, disloyal management and document forgery.
- Offences against public health linked to products distributed by the company.

To mitigate these risks, AGEM has committed to establishing and maintaining effective prevention and control mechanisms, which include:

- Specific internal policies and procedures.
- Periodic audits.

- Ongoing risk assessments.
- Documentary and accounting traceability systems.

6. Reporting channel and whistleblower protection

AGEM provides employees and third parties with an **ethics reporting channel**, which is secure, confidential and accessible, through which the following may be reported:

- Conduct contrary to this Code.
- Possible legal infringements.
- Conduct capable of generating criminal liability for the organisation.

The confidentiality of the whistleblower's identity is guaranteed, as is the **absolute prohibition of retaliation**. Management of the channel will be undertaken by the company's criminal compliance body, in an objective and independent manner.

7. Compliance body and its functions

AGEM will have a criminal compliance body that will assume, among others, the following functions:

- Supervision of the implementation and effectiveness of this Code.
- Regulatory interpretation and resolution of queries.
- Receipt, investigation and processing of reports.
- Coordination of corrective and disciplinary actions.

This body must have **functional independence**, adequate resources and direct access to the governing body.

8. Training, communication and dissemination of the Code

AGEM will guarantee the effective dissemination of this Code through:

- Its publication in internal and external media.
- Specific training actions by risk profile.
- Awareness-raising mechanisms and periodic reminders.

Training in ethics and compliance matters will constitute a formal obligation for all staff.

9. Disciplinary regime

Failure to comply with this Code of Ethics may give rise to disciplinary measures proportionate to the seriousness of the facts, in accordance with the provisions of

applicable labour legislation, applicable collective bargaining agreements and internal regulations.

In cases of particular severity, AGEM may take the corresponding legal action, including criminal or civil action.

10. Adherence and express commitment

All recipients of the Code must:

- Declare in writing their knowledge, understanding and commitment to the principles set out herein.
- Commit to its effective compliance.
- Report any breach of which they become aware.

11. Validity, reviews and continuous improvement

This Code will enter into force upon its approval by AGEM's governing body. It will be subject to periodic review and may be updated in line with regulatory or case-law developments, detected risks or the organisational structure.