

Code of Conduct and Ethics of Group Quirónsalud



Table of content

1.	PRESENTATION OF THE GROUP	3
2.	PURPOSE AND SCOPE	3
2.1	Purpose	3
2.2	Scope	4
3.	PURPOSE, MISSION, VISION, VALUES AND PRINCIPLES	4
3.1	Our purpose.....	4
3.2	Our mission.....	4
3.3	Our vision	5
3.4	Our values.....	5
3.5	Our principles.....	6
4.	COMPLIANCE WITH LEGISLATION.....	6
4.1	Compliance with regulations.....	7
4.2	Health legislation.....	7
4.3	Occupational Health and Safety	8
4.4	Quality of care, patient experience and safety.....	8
4.5	Respect for Competition	9
4.6	Industrial and intellectual property rights.....	10
4.7	Asset protection.....	10
4.8	Personal data protection and confidentiality	10
4.9	Proper use of information systems.....	10
4.10	Financial and non-financial information.....	10
4.11	Anticorruption	11
4.12	Money laundering.....	11
4.13	Compliance with tax obligations.....	12
4.14	Collaboration with administrative and judicial authorities	12
5	PRINCIPLES OF ETHICAL CONDUCT	12
5.1	We put people above all else.....	12
5.2	Commitment to providing a quality service.....	13
5.2.1	With respect to persons attending the Group's centers.....	13
5.2.2.	Respect for facilities and equipment.....	13
5.2.3.	Right to information and privacy.....	13
5.3	We encourage respect and teamwork.....	14
5.3.1	Respect.....	14

5.3.2	Working Environment.....	15
5.3.3	Committed to human and labor rights.....	15
5.3.4	Non-discrimination and equal opportunity	15
5.3.5	Reconciliation of personal and family life with business activity	16
5.3.6	Hiring of family and friends.....	16
5.4	Integrity, honesty and closeness to people	16
5.4.1	Integrity	17
5.4.2	Impartiality and objectivity	17
5.4.3	Conflict of interest.....	17
5.4.4	Proper use of inside information	17
5.5	We act in a socially responsible manner.....	18
5.5.1	Environmental responsibility.....	18
5.5.2	Collaboration with stakeholders	19
5.5.3	Protection of the Quirónsalud Group's reputation	19
5.5.4	Media relations and social networks.....	19
5.5.5	Relationship with suppliers.....	19
5.5.6	Political or associative activities	20
6	COMMUNICATION, DISSEMINATION AND ADHERENCE TO THE CODE OF CONDUCT	20
6.1.	COMMUNICATION	20
6.2.	DISSEMINATION AND ADHERENCE.....	20
6.3	CONSULTATIONS.....	20
7	COMPLIANCE.....	21
7.1	Body responsible for Code compliance.....	21
7.2	Complaints channel	21
7.3	Disciplinary regime	22
8	APPROVAL AND REVIEW.....	22
8.1	Approval.....	22
8.2	Review	22

1. PRESENTATION OF THE GROUP

Quirónsalud is the leading group in the provision of healthcare and occupational risk prevention services in Spain. Integrated in the multinational Fresenius Group, together with "Helios", it forms the largest private hospital group in Europe and it is one of the largest in the world. Quirónsalud manages more than 100 healthcare centers, mainly in Spain but also in other countries like Portugal and the United Arab Emirates, where in recent years it has acquired a solid foothold in presence. For its part, the Fresenius Group is present in more than 100 countries in which it operates with an absolute commitment to health as well as to the most comprehensive and highest quality care and attention quality.

At Quirónsalud, we are committed to person-to-person health care, with the best professionals in the services that cover all medical specialties and with the best diagnostic and treatment techniques.

2. PURPOSE AND SCOPE

2.1 PURPOSE

This Code of Conduct and Ethics (hereinafter, the "**Code**"), contains the principles and values that must govern the actions of all the Professionals of Helios Healthcare Spain, S.L.U.¹, Helios Finance Spain, S.L.U.^{*1}, as well as the companies of its Group of companies as defined in Article 42 of the Spanish Commercial Code (hereinafter and indistinctly, the "Quirónsalud Group" or the "Group"), so that all of them carry out their activities in a responsible manner, in accordance with current regulations and the principles and practices required by the Group, moving towards the highest levels of Good Governance and Transparency as hallmarks of a responsible company and a trusted brand.

This Code complements the legal regulations applicable to Professionals, serving as a guide for action for all persons working in the Group. It has been drafted taking into consideration the applicable regulations, as well as the recommendations of the Fresenius Group, of which Quirónsalud forms part. This Code of Conduct has been drawn up at the proposal of the Group's Compliance Committee, which is the body that oversees regulatory compliance and good practices in the Quirónsalud Group and is made up of management personnel from all Quirónsalud business areas. Any Professional can contact the Compliance Committee through the Whistleblower Channel enabled on the Group's Intranet, either for aspects related to the Code of Conduct or for any other issue related to crime prevention and regulatory compliance.

¹ Official name of the parent companies under the trade name "Quirónsalud".

2.2 SCOPE

For the purposes of this Code, a "Professional" of Quirónsalud, and therefore subject to the provisions of this Code of Conduct, is considered to be all managers, employees, collaborators and external personnel -including those persons and/or companies that provide their services through service contracts, temporary employment agencies or in any other way- who may at any time represent Quirónsalud in the market and/or before third parties-, Temporary Employment Companies or in any other way - who may at any time represent Quirónsalud in the market and/or before third parties.

Likewise, this Code applies to any individual or legal entity that contracts with Quirónsalud as a supplier, client, partner or collaborator of the Group.

3. PURPOSE, MISSION, VISION, VALUES AND PRINCIPLES

3.1 OUR PURPOSE

Our purpose is to build together a sustainable future of health and wellbeing for people. To this end, we are fortunate to have a team of thousands of professionals who share and realize our purpose and work with a belief in a healthier and more sustainable future.

3.2 OUR MISSION

Quirónsalud's mission is to care for people's health and well-being, providing them with top-quality healthcare and occupational risk prevention services with the best professionals, modern hospital structures, advanced technological resources and innovative care processes.

We seek to develop our activity with the best professionalism, respect and efficiency.

We attach great importance and value to our teaching and research work, which serves to transfer the results of our advances to the whole of society, as well as to contribute to the field of knowledge.

We believe that the focus of all our activities is the person. Therefore, "we are health, person to person".

3.3 OUR VISION

We are the leading hospital and occupational risk prevention group in Spain and a benchmark in the field of Europe and on a worldwide level and we want to be recognized by patients and medical professionals, institutions, companies and workers as an entity of trust and a guarantee of quality of care and preventive. For this reason, at Quirónsalud Group we opt for:

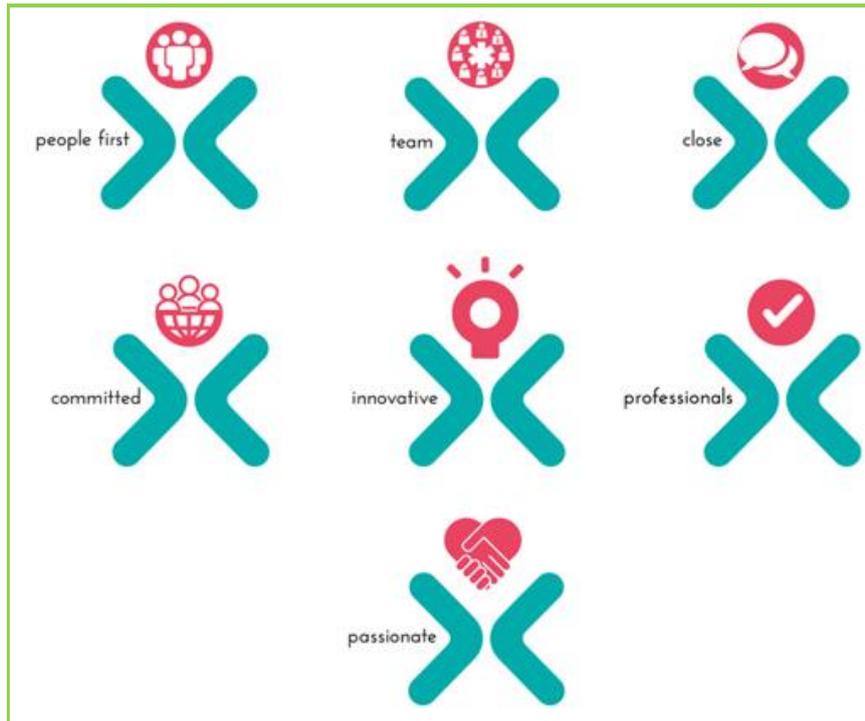
- Develop a strong identity and self-image, which generates recognition and pride of belonging.
- To have an efficient network of centers and hospitals, which offer a wide range of services and adequate to the health needs of the patients and supported by a comprehensive, effective and in healthcare, technological and human excellence.
- Collaborate with the Public Health System to ensure that our hospitals and health care centers can meet the needs of a larger part of the population
- Promote innovation, research and teaching with the aim to continue to be a benchmark in medical and healthcare advances.
- To seek constant improvement in the quality of technological, human and assistance equipment of all our centers.



We want to continue to be the benchmark in healthcare due to the excellence of our services

3.4 OUR VALUES

This Code is intended to be the reference framework for the actions of the Quirónsalud Group, with the purpose of that they are transparent, fair and efficient and are carried out in the best interest of users of our services and of society in general.



3.5 OUR PRINCIPLES

The Quirónsalud Group's principles of conduct, based on compliance with the law and on ethics, must be complied with in the development of the Quirónsalud Group's activities:

- Always comply with the law and regulations;
- Putting people first and being respectful and sensitive to their expectations and needs;
- To be committed to the provision of a comprehensive care service, oriented to the achievement of the following objectives of excellence in patient experience and safety, counting for this purpose with the help of professionals of the highest level as well as the most innovative medical technology and procedures;
- Encourage professional development and teamwork;
- To protect our professionals so that they can carry out their activities in an environment of the highest quality. security, making effective, efficient and adequate use of resources;
- To ensure integrity, honesty and closeness in our relationships; and
- Act in a socially and environmentally responsible manner.

4. COMPLIANCE WITH LEGISLATION

At the Quirónsalud Group, we are fully committed to complying with all the legislation applicable to the activity we carry out, among which are:

- Health regulations.

- The regulations that protect the rights of workers, including their protection and health, occupational safety and hygiene.
- Compliance with Human Rights.
- Patient safety and quality of care standards.
- Environmental protection regulations.
- Tax, commercial and competition regulations.
- The regulations governing data protection.
- Regulations for the prevention and fight against corruption.



Compliance with regulations is an absolute imperative at the Quirónsalud Group

4.1 COMPLIANCE WITH REGULATIONS

All Professionals must comply with the laws that apply to us, the provisions of this Code of Conduct and any other rules of the Quirónsalud Group's Corporate Governance that are applicable to our activity.

In addition, Quirónsalud Professionals must ensure that suppliers, clients, partners and collaborators with whom we interact on behalf of Quirónsalud are aware of and comply with the contents of this Code of Conduct.

4.2 HEALTH LEGISLATION

The Professionals pay special attention to compliance with health legislation, as well as with other regulations, the Quirónsalud Group's standards of care and, in the absence of these, to the rest of the regulations, to the standards of care of the Quirónsalud Group and, in the absence of these, to the recommendations of the reference entities in the health sector.

All Professionals linked to the Quirónsalud Group must reject any action or practice that is contrary to health regulations and must inform their manager and/or communicate through the Whistleblower Channel any action of which they become aware in this regard.

Quirónsalud professionals must follow the medication management and control protocols established for this purpose by the centers' pharmacy services, paying special attention to those that regulate the handling of narcotics and psychotropic drugs. Similarly, we must maintain due control over prescriptions and dispensing orders and over assisted reproduction processes.



4.3 OCCUPATIONAL HEALTH AND SAFETY

At the Quirónsalud Group, the occupational health and safety of our professionals is a priority objective.

The different health crises (such as the COVID-19 pandemic) have highlighted even more the fundamental importance of the safety and health of the people who make up our workforce, for which reason: (i) we must at all times respect the preventive measures applicable to occupational health and safety, both those applicable to all Professionals and those specifically defined according to the professional group; and (ii) we must ensure that the people who provide their services at Quirónsalud carry out their activities in optimal safety conditions.

In particular, each Professional is expected to:

- a. Adhere to safety and risk prevention policies, procedures, and protocols to ensure a safe and controlled work environment. In cases similar to that generated by the COVID-19, complying with the protocols to minimize contagion is a fundamental requirement in the Quirónsalud Group.
- b. Cooperate and take an active part in the implementation of safety and health policies and measures in the work place.
- c. Immediately inform your line manager, as well as the management of your work unit and the persons in charge of health and safety, in case you notice any risk factor that may affect the health or safety of workers, any other Professional, as well as clients, patients or visitors to our centers.

4.4 QUALITY OF CARE, PATIENT EXPERIENCE AND SAFETY

- a. Safety and quality of care are one of the basic pillars of Quirónsalud's strategy, which is why all the Professionals who work at a Quirónsalud center acquire, from the moment they join the center, an unavoidable commitment to maintain the highest level of personal and team standards with respect to quality of care and patient safety in each and every one of their actions. Professionals must at all times apply the procedures established for this purpose by the Quirónsalud Group, which they are obliged to know when carrying out their activity.
- b. In this sense, all professionals will adopt safe behavioral attitudes and behaviors to achieve excellence in patient experience and safety, maximizing health outcomes and minimizing risks to reduce unnecessary patient harm associated with healthcare.
- c. More specifically, their attitude and behavior shall be aligned with the following practices in the performance of its activity, either face-to-face or virtual:
 - To treat patients with respect, empathy, in a personalized and appropriate manner to their needs and expectations, within the standards of care set by Quirónsalud for its centers.

- Provide the patient with all the necessary information about the care process, so that he/she can give his/her free and meditated consent, as well as respect the patient's wishes.
- When the activity so requires, obtain the patient's informed consent in accordance with the adequacy standards established for this document by current regulations and by the quality standards of the Quirónsalud Group.
- Complete on time, reliably and on the supports determined for this purpose, the clinical and non-clinical records and documents defined for the activity carried out.
- Report patient safety incidents through the channels established in the center and become actively involved in their prevention and resolution.
- Contribute to the prevention of healthcare-associated infection (HCAI) with, among others, the following guidelines: extreme personal hygiene, proper hand hygiene, appropriate use of uniforms, compliance with clean and unclean protocols and the application of any other measures that Quirónsalud has defined to prevent HCAI.
- Comply with the protocols established for this purpose to ensure safety in invasive procedures, such as, for example, carrying out the process of prior verification, marking the surgical site and surgical pause, among others.
- Ensure that communication with other professionals in relation to patient care is effective, timely, accurate, complete, unequivocal and understood by the recipient.
- Take extreme precautions in the handling of high-risk medications and equipment.
- Not to perform activities for which he/she does not have demonstrated competence, nor are they supported by scientific evidence, which may only be performed within the framework of research studies previously approved by a Clinical Research Ethics Committee.
- Not to carry out futile or redundant activities in the therapeutic treatment.
- Respect patients' advance directives.

If any Professional identifies difficulties in the application of these practices or detects a need for improvement in their application, he/she shall inform the Center's Management, his/her hierarchical superior or communicate it through the Group's Whistleblower Channel.

4.5 RESPECT FOR COMPETITION

The Group, its management body and the entire group of Professionals must reject and refrain from any behavior aimed at preventing, restricting or distorting market competition or any act that could be considered unfair competition.

The Group does not maintain any type of link or agreement with its competitors, nor does it make use of any dominant position in the market to discriminate against other competitors using illicit business practices. The Quirónsalud Group promotes greater and fairer competition in the market and treats and undertakes

to treat its competitors, suppliers and clients in a fair, professional, honest and respectful manner.

4.6 INDUSTRIAL AND INTELLECTUAL PROPERTY RIGHTS

The Quirónsalud Group does not allow any deliberate action aimed at infringing the industrial and intellectual property rights of third parties, regardless of the motivation for such acts.

4.7 ASSET PROTECTION

The Group's team of professionals, in compliance with the procedures of the control established to protect the assets, you should not perform any act of alienation, transmission, irregular use, assignment or concealment of any property owned by the Quirónsalud Group with the purpose of avoiding the compliance with its responsibilities to third parties and/or to the company's to its shareholders.



4.8 PERSONAL DATA PROTECTION AND CONFIDENTIALITY

The team of Quirónsalud Professionals complies with the applicable regulations on data protection and guarantees the right to privacy, maintaining professional secrecy with respect to any non-public data or information known to us as a result of the exercise of our professional activity, whether they come from or refer to patients, clients, the Quirónsalud Group, other Professionals and/or any other third party. This obligation of secrecy and respect for data protection regulations persists even after the relationship with the Quirónsalud Group has ended and is essential, given the nature of the data and the special importance and protection they deserve.

4.9 PROPER USE OF INFORMATION SYSTEMS

Quirónsalud Professionals must make proper and correct use of the information systems made available to us in the Group. We will refrain from using them for personal purposes, from installing software that does not have the approval of the Information Systems Department, and from using them to access spaces or web pages that are not necessarily related to our professional activity, due to the risk this poses for the entire Quirónsalud Group. Computer attacks are becoming more and more frequent, so we will comply with the recommendations and regulations that the Quirónsalud Group's management may communicate to us in order to minimize these risk. This obligation is of fundamental importance since the aforementioned information systems store, among other things, patient data that are especially sensitive due to their nature and content.

4.10 FINANCIAL AND NON-FINANCIAL INFORMATION

As a group of Professionals, we ensure that all data, information and documents we prepare or for which we are responsible to third parties are accurate and true.

The Group complies with applicable laws and accounting standards, and we ensure that the financial information we present or publish accurately, truthfully and fairly reflects our net worth, economic and financial position.

4.11 ANTICORRUPTION

Generally, the Quirónsalud Professionals group does not wish to receive gifts from third parties in the exercise of our professional activities. These may only be accepted when they conform to social uses appropriate to the environment and only if each and every one of the conditions required in the specific anti-corruption policies established in the Group are met, which basically establish that such gifts may in no case serve to influence a business or economic decision or may bring a benefit to any of the parties involved in the transaction.

All Professionals must avoid situations that may generate a conflict of interest, so we may not personally receive money, or any other type of asset or economic consideration or in kind, from patients, clients, suppliers, intermediaries, or any other third party, even as a loan, except if such transaction is carried out in the context of a transparent and legal business relationship conducted at market prices.



The Professionals may not, under any circumstances, deliver, promise or offer any kind of payment, gift or reward to any authority, public official, employees, executives or managers of companies or public entities, or to employees, executives or managers of other entities or companies, either directly or indirectly through persons or companies related to us, with the purpose of influencing or trying to influence in order to obtain any kind of unjustified advantage, favor or commercial or administrative benefit.

The aforementioned deliveries promises and/or offers are prohibited for the entire group of Professionals working in the Group and may not be made either directly or through partners, collaborators, representatives, family members, intermediaries, agents, advisors or any other type of intermediary.

In short, the team of Professionals rejects any act that could be considered as corruption under this Code or any of the anti-corruption regulations applicable under the Group's rules of good governance and we are obliged to inform our superiors of any action of which we become aware in this regard.

4.12 MONEY LAUNDERING

The Professionals reject any transaction that may have indications or risk of incurring in Money laundering or financing of terrorism, for which we are committed to identify. We are committed to providing our customers with the best possible service and to require payment preferably by bank or credit card, not allowing cash payments more than the limits of the applicable regulations in each country.

4.13 COMPLIANCE WITH TAX OBLIGATIONS

The entire group of Professionals must comply with the tax obligations affecting our activity, avoiding any practice that could imply an infringement, circumvention of our taxes or prejudice to third parties. This includes payment of all applicable taxes, as well as compliance with all tax regulations.



4.14 COLLABORATION WITH ADMINISTRATIVE AND JUDICIAL AUTHORITIES

All Professionals must maintain an attitude of respect and collaboration with the representatives of the administrative and judicial authorities within the framework of our competences. The team of Professionals must promptly pass on to the Quirónsalud Group's legal services any requests for information or judicial and/or administrative inspection communications so that a response can be given to such requests and communications.

5 PRINCIPLES OF ETHICAL CONDUCT

First, the people

5.1 WE PUT PEOPLE ABOVE ALL ELSE

The main objective of the Quirónsalud Group is to provide comprehensive health services to the people who trust in us to receive our services, whether health care or occupational risk prevention, in a context of excellence in terms of the adequacy and effectiveness of the diagnostic and therapeutic means used, human treatment and efficiency of the organization and the use of resources.

This principle obliges us to have infrastructures adapted to the activities carried out in them, to always use the most advanced and proven technology, to use the best available techniques, to have excellent professionals and to commit ourselves to continuous training and professional development. All this is combined with the most rigorous scientific research, which is essential to provide excellent healthcare.

We must treat our patients and their companions in the best human and healthcare manner. We are committed to this moral and professional obligation and this implies a work of accompaniment in the process of prevention, cure or ailment.

Each person is unique and we must consider their personal situation when they are treated in any of our centers. Our professionals also deserve the best treatment, the most humane treatment and the best professional development,

and we expect them to strive to provide the best treatment, to be motivated in their professional practice and to act with loyalty to the Quirónsalud Group.

Quality, experience and patient safety guide our activity

5.2 COMMITMENT TO PROVIDING A QUALITY SERVICE

5.2.1 With respect to persons attending the Group's centers

At the Quirónsalud Group, we consider quality of care, experience and patient safety to be one of the pillars of our activity and an essential value in our professional performance. It is the duty of each Professional to maintain the highest level of personal and professional standards, with the utmost respect and decorum in the performance of their duties and in their relations with patients, clients and other Professionals, without any discrimination on the basis of sex, age, religion, sexual orientation or any other reason, and being very careful with personal comments or evaluations, in order to avoid offending any sensitivities.

The Quirónsalud Group promotes and encourages commitment to the adequacy of clinical practice, acting in accordance with the best national and international practices.

Consequently, each Professional aims to achieve the highest levels of excellence in the provision of services to our patients, who trust us in their most delicate moments and who undoubtedly deserve the best care.

Therefore, healthcare decisions based on criteria that are not based on scientific evidence and adequacy in the use of resources, and even less on our own interests and benefits, are unacceptable. Professional in the Quirónsalud Group.

5.2.2. Respect for facilities and equipment

We, the team of professionals, must carry out our activities in a correct and responsible manner of the equipment, facilities, services and economic resources that are made available to us, being responsible for the assets entrusted to us and preserving them from any loss, damage, theft or illegal or dishonest use.

5.2.3. Right to information and privacy

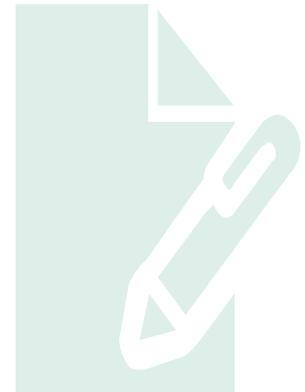
It is our responsibility to provide personalized, clear and sufficient information to the patient and his or her family members so that they are aware of the service that will be provided, the diagnosis of their disease, the different treatment possibilities, as well as the risk derived from such treatment. The patient has the right and should actively participate in the decisions that affect him/her and should be informed about the evolution of his/her treatment or service.

All of us professionals must respect patients' decisions made with autonomy and sufficient will, including those referring to their last wishes and/or end-of-life support and care.

It is also our responsibility to protect the privacy of each patient and the secrecy of the information that affects them, not providing information to third parties without their express consent or without the protection of legal regulations and of course, without making any misuse of such information.

The use of mobile or recording devices must be especially careful, always respecting the consent of each patient, their privacy, as well as the confidentiality of their information. Under no circumstances may recordings be made without the consent of those persons who may be included in such recordings.

Likewise, the use of social networks, as well as the comments and/or opinions that Quirónsalud Professionals may express therein, must always be respectful of patients, other Professionals and the Group. All this even in the event that such comments and/or opinions are made in a personal capacity, as long as it is possible to identify the author of the comment as a Professional in one way or another linked to Quirónsalud.



Never put your individual interests first. We are a team with a very specific purpose: the best care for people

5.3 WE ENCOURAGE RESPECT AND TEAMWORK

5.3.1 Respect

We expect all professionals to work in a collaborative, respectful and open manner, always thinking of the well-being of the people we treat.

We encourage proactive listening to each Professional and respect their personal lives.

In particular, we ensure that the hierarchy in the organization is not transformed into the exercise of a harmful to the dignity and autonomy of individuals.

It is our obligation to identify disrespectful behavior and to act decisively in response to it, trying to prevent these shortfalls from occurring.

The management team of the Quirónsalud Group must behave in an exemplary and coherent manner in relation to the principles of conduct developed in this Code.

5.3.2 Working Environment

The Quirónsalud Group's team of Professionals, and especially those who perform management functions, must foster an atmosphere of cooperation and collaboration that contributes to the achievement of the Group's objectives, within a positive work environment.

Harassment, abuse, intimidation, lack of respect and consideration, or any type of physical or verbal aggression are totally unacceptable for the Quirónsalud Group and will not be permitted or tolerated. Professionals in charge of personnel in the Quirónsalud Group must prevent and take measures to ensure that such situations do not occur.

In the Quirónsalud Group we do not allow any conduct that constitutes harassment at work, sexual, psychological or of any other nature among Professionals or towards patients, clients or any other person who comes to Quirónsalud.

Any employee who believes he or she has been subjected to harassment must report such conduct immediately through the channel set up for this purpose at his or her work center or, as a last resort, through the Group's Whistleblower Channel, so that the Compliance Committee can investigate the complaint received, acting accordingly depending on the outcome of the investigation. All misconduct must be reported. All communications will be treated with the utmost confidentiality and respect for privacy.

5.3.3 Committed to human and labor rights

At the Quirónsalud Group we are committed to the human and labor rights recognized in national and international legislation, including those of the United Nations Universal Declaration of Human Rights.

Quirónsalud follows the guidelines of our parent company: the Fresenius Commitment to Human Rights, which is applicable to all activities and businesses of the companies that make up the Fresenius Group.

In order to fulfill our responsibility as a health care company, we are concerned with different areas in relation to human rights:

- We do not tolerate the use or threat of violence or any other form of coercion
- We strictly prohibit the use, support or approval of child exploitation and abuse of children and forced labor
- We support equal opportunity and take a clear stance against the use of discrimination in all its forms
- We respect the freedom of association and the recognition of the right to collective bargaining as well as the rights recognized by law and by the collective bargaining agreements in force

5.3.4 Non-discrimination and equal opportunity

We guarantee a fair opportunity in access to work, as well as in professional promotion, always ensuring the absence of situations of discrimination or favoritism based on race, nationality, social origin, age, sex, marital status, sexual

orientation, ideology, political or union, religious opinions or any other personal, physical or social condition.

Consequently, the team of Professionals involved in hiring, selection and/or professional promotion processes shall be guided by objectivity and transparency in their actions and decisions, with an open attitude towards diversity and with the aim of identifying those persons most in line with the profile and needs of the position to be filled, always promoting equal opportunities and based on a merit-based system.



5.3.5 Reconciliation of personal and family life with business activity

At the Quirónsalud Group, we respect the personal and family life of our Professionals and we promote work-life balance policies that facilitate the best and greatest balance with the professional responsibilities, considering the planning of services and needs of the patients.

5.3.6 Hiring of family and friends

The Group establishes fixed and transparent rules in relation to recruitment and employment, avoiding the hiring of close relatives of Group employees based on such a motive. These rules are particularly aimed at avoiding any risk or perception of favoritism or nepotism.

Generally, the hiring of relatives is not allowed except in those cases in which the relative is going to work in a different work center from the one where the Group Professional works, regardless of the degree of kinship and the type of contract to be performed, and provided that he/she has been hired only on merit through an open and competitive process.

No hiring shall contemplate any favoritism with candidates who are relatives or friends of any Professional.



In order to guarantee objectivity and avoid conflicts of interest, family members shall not have direct or indirect hierarchical relationships among themselves, unless exempted by the Compliance and Risk Committee, which shall ensure that hiring and professional promotion is based on meritocracy, without the influence of family and personal relationships.

5.4 INTEGRITY, HONESTY AND CLOSENESS TO PEOPLE

We want the entire group of professionals to feel proud to work at Quirónsalud

The Quirónsalud Group's team of professionals is characterized by commitment, honesty and close contact with people, offering quality services and behaving with integrity.

5.4.1 Integrity

The group of Quirónsalud Professionals carries out an integral professional activity. Integrity is understood as upright, impartial, honest and in accordance with the principles, values, and interests of the Quirónsalud Group, all in accordance with the terms of this Code of Conduct.

In particular, the team of Professionals will not participate in activities that are illegal or contrary to the principles established in this Code of Conduct.

5.4.2 Impartiality and objectivity

The team of professionals will not allow ourselves to be influenced in our professional performance in any way by third parties, always guaranteeing professional impartiality and objectivity.

5.4.3 Conflict of interest

The team of Professionals will refrain from participating in situations and activities that involve a conflict of interest with the Group's business activities or with the principles and rules that we must comply with as Professionals of the Group. Likewise, we must inform third parties with whom we maintain business relationships of any economic or other type of relationship that could involve a conflict of interest with them.

In this regard, the team of Professionals will always act in the interests of the Quirónsalud Group and not in our own private interests, including those of our family members and acquaintances.

The team of Professionals has a duty to inform our managers of any event that could involve a conflict of interest under this Code, under any of the Company's good governance rules or under applicable law.

5.4.4 Proper use of inside information

Insider information is defined as information of a non-public nature that a third party would consider relevant when making decisions affecting the Group and/or its shareholders. Such information includes, for example, financial results, information about possible mergers, acquisitions or divestitures, capital increases, licensing agreements, merger and acquisition collaboration or otherwise that may be analyzed at the Quirónsalud Group at any time, among others.

All Group Professionals must keep privileged information at the highest level of confidentiality. The Group's information is strictly confidential and may not be disclosed to unauthorized persons, whether they belong to the Group, including the Professionals' family members, as well as not to use it for the obtaining of any benefit to us or any person associated with us.

5.5 WE ACT IN A SOCIALLY RESPONSIBLE MANNER

The Quirónsalud Group is aware of the needs of the environment, both socially and environmentally, so all employees of the Group will act responsibly, being sensitive to social and environmental realities by adopting habits and behaviors related to good practices of the sector and the policies developed by the Group.

We protect the health of our environment contributing firmly to the fight against climate change and promoting the principles of circular economy.

We are committed to Social Action by participating in social initiatives that contribute to improving the health and well-being of all people, promoting, contributing, and disseminating to society as a whole an education that promotes healthy lifestyles, promoting a culture of prevention and good physical, mental health and nutritional exercise practices.

At the Quirónsalud Group we behave responsibly with all our stakeholders

5.5.1 Environmental responsibility

The Quirónsalud Group's team of professionals is actively and responsibly committed to protecting the environment and respecting the regulatory requirements in this area, following the recommendations and procedures established by the Quirónsalud Group for the correct environmental management of each center, which includes the efficient management of resources and the generation and appropriate treatment of waste generated in its activity.

As part of our commitment to the environment, we apply the precautionary principle to minimize the environmental impact of our activity, taking appropriate preventive measures and thus advancing in the continuous improvement towards more environmentally friendly processes, since a healthy environment is crucial for health, the focus of our activity. For this reason, environmental protection is a fundamental area of Quirónsalud's policy. We actively seek to use new technologies and more sustainable processes and to minimize our environmental impact. We must all identify possible improvements and work constantly for a better and more sustainable working environment, based on:



- The promotion of eco-efficiency through the rational use of natural resources and strong support in the fight against climate change.
- Pollution prevention by minimizing waste, promoting the use of environmentally friendly products.
- Awareness of responsible environmental management in decision making, in business operations, as well as in daily and consumer habits.

In diagnostic and medical treatment activities that involve the use of machinery that produces ionizing radiation or other hospital waste, we apply the prevention

and safety measures established in the radiological protection programs, guaranteeing quality in radiodiagnosis, radiotherapy and nuclear medicine.

5.5.2 Collaboration with stakeholders

Group-wide guidelines and policies applicable to our interactions with stakeholders and civil society are based on transparency and respect.

A frank and constructive dialogue with our stakeholders is crucial to improving our ability to create value and sustainable growth. It helps us to better understand how to serve patients and physicians and to better focus our activities.

The Quirónsalud Group respects the commitments and obligations acquired in its relations with third parties, both nationally and internationally.

5.5.3 Protection of the Quirónsalud Group's reputation

The entire team of professionals must:

- a. Refrain from any action that could damage the reputation of the Group.
- b. Bringing any situation that may adversely affect the Group's reputation to the attention of Management and the Compliance and Risk Committee.
- c. To act with respect for the good name and reputation of Quirónsalud.
- d. Apply the values of Quirónsalud in our daily actions.
- e. In our professional practice, avoid speaking or writing about matters that are outside our scope of action.

5.5.4 Media relations and social networks

The team of Professionals will refrain from transmitting, on our own initiative or at the request of third parties, any information or news about the Quirónsalud Group or third parties to the media, referring to the Quirónsalud Group's Communication Department for this purpose.

In the event that the request for information is made by a supervisory body or judicial or administrative authority, we will immediately inform the hospital management or the Legal Department.



The Quirónsalud Group's team of Professionals must apply the Group's communication protocols, both general and in social networks.

In any case, the team of Professionals will avoid the dissemination of any comment or rumor that may harm the Quirónsalud Group.

5.5.5 Relationship with suppliers

The selection of suppliers and subcontractors must be carried out with criteria of transparency, objectivity, and free competition, so as to guarantee the quality of the goods or services purchased and the best economic conditions, assessing the technical and financial solvency of the supplier/contractor, as well as previous experience and their ethical, social and environmental commitments.

The Professionals, and especially those involved in decisions on the procurement of supplies, services, or the setting of economic conditions, must avoid any kind of interference that may affect the impartiality or objectivity in the procurement process.

5.5.6 Political or associative activities

The linkage, membership or collaboration with political parties or other types of entities, institutions, or associations with public purposes or that go beyond the Group's own purposes, as well as the contributions or services to them, shall be made in such a manner as to make clear the character and avoiding any damage to the name of the Quirónsalud Group and within the framework of strict observance of the laws in force at any given time.

The image and reputation of Quirónsalud is a key element for our organization, and therefore the messages issued internally and externally by the Professionals must always be clear, in line with the principle of political neutrality and in line with our mission, vision and values.

6 COMMUNICATION, DISSEMINATION AND ADHERENCE TO THE CODE OF CONDUCT

6.1. COMMUNICATION

The Compliance Committee is responsible for permanently and proactively ensuring that all Professionals comply with and update the Group's Code of Conduct, promoting the necessary actions for its dissemination and knowledge.

6.2. DISSEMINATION AND ADHERENCE

All Professionals have access to this Code on the Employee Portal and must accept its full contents, modifications and updates. This document of acceptance is a permanent part of the professional files.

The Group also provides its Professionals with various channels and tools to promote the dissemination of this Code, such as: information on the Employee Portal and in the "Compliance & Ethics" folder on the Intranet, receipt of internal communications, queries to the compliance department, training courses at the Quirónsalud University, among others. This document of acceptance is a permanent part of the professional files.

6.3 CONSULTATIONS

The Risk and Compliance Committee is responsible for resolving any queries or doubts that may arise for any Professional in relation to the Code. Questions may also be raised or advice may be sought from the Risk, Internal Audit and Compliance Department through the following e-mail address: compliance@quironsalud.es.

Having open channels of communication, without fear of reprisals, will be essential to ensure the effective implementation of this Code in the Group. For this reason, Quirónsalud has the duty to protect the informant and ensure their confidentiality.

7 COMPLIANCE

This Code of Conduct has been drawn up at the proposal of the Group's Risk and Compliance Committee, which is the body that oversees regulatory compliance and good practices in the Quirónsalud Group and is made up of management personnel from all of Quirónsalud's business areas.

Any Professional or any interested third party may contact the Risk and Compliance Committee through the Whistleblower Channel provided on the Group's corporate website, either for aspects related to the Code of Conduct or for any other issue related to crime prevention and regulatory compliance.

Professionals have the obligation to know and comply with this Code of Conduct and to collaborate to facilitate its implementation in the Quirónsalud Group, as well as to attend and participate in all training activities to which we are invited for the adequate knowledge of the Code.

7.1 BODY RESPONSIBLE FOR CODE COMPLIANCE

The Group's Board of Directors will not tolerate any breach of this Code of Conduct and therefore no Professional, regardless of level or position, is authorized to breach or request any other Professional to breach or request the provisions of this Code. Likewise, no Professional may justify improper conduct based on those in charge, in ignorance of this document or in covert conduct under apparently appropriate behaviors.

7.2 COMPLAINTS CHANNEL

A confidential, secure and independent communication channel, called the "Whistleblowing Channel", is made available to any interested person, so that any person may warn or report facts, behaviour or situations that may be considered unethical or lacking in integrity, contrary to the principles and rules set forth in this Code, or contrary to the Law or the Group's internal regulations.

This Whistleblower Channel is accessible on the **corporate website** at the following link:

 <https://www.quironsalud.com/es/grupo/experiencia-importa/canal-denuncias>

The same Whistleblowing Channel is available to Professionals on the Group's own Intranet so that it is accessible to any Professional who has knowledge or a well-founded suspicion of a breach of this Code and can report it.

 <https://channel.globalsuitesolutions.com/canaldenunciasquiron-lener>

Likewise, in order to provide an alternative channel of communication, reports of non-compliance detected may be sent by e-mail to: canaldedenuncias@quironsalud.

The aim is to enable the Quirónsalud Group to prevent, detect, react to and repair any acts or omissions that may constitute an irregularity, non-compliance or infringement, limiting and minimizing their consequences and damages, and preventing them from recurring in the future.



The Risk and Compliance Committee shall guarantee the confidentiality of the reports it receives in accordance with the provisions of the "Whistleblower Channel Policy", and it is strictly forbidden to take any reprisals against the Group Professional who has made a report, in accordance with the provisions of Law 2/2023 regulating the protection of persons who report breaches of regulations and the fight against corruption. This prohibition shall not prevent the adoption of the appropriate disciplinary measures if the internal investigation determines that the report is false and has been made in bad faith.

7.3 DISCIPLINARY REGIME

Failure to comply with the Code of Conduct may give rise to the sanctions established in the Quirónsalud Group's Disciplinary Regime, without prejudice to the labor, administrative or criminal liabilities provided for in the legal system, including the labor disciplinary regime, as well as the termination of commercial, service provision and collaboration contracts.

8 APPROVAL AND REVIEW

8.1 APPROVAL

This Code of Conduct was approved in 2023 by the Risk and Compliance Committee and the Group's Management Board.

8.2 REVIEW

Any amendment to this Code of Conduct must be approved by the Group's Management Board at the proposal of the Risk and Compliance Committee.

