

Global Marketing Policy

Document	Global Marketing Policy
Approver	Chief Marketing Officer

Confidentiality - This document is confidential. Therefore, it must not be distributed outside Grupo J. Uriach S.L. employees without the consent of its Board of Directors.

1. Definitions

- a) **Uriach:** Composed of Grupo J. Uriach, S.L. and the rest of the entities within the criminal scope of control. Hereinafter also referred to, indistinctly, as “**Uriach**” or the “**Organisation**”.
- b) **Criminal scope of control:** includes Grupo J. Uriach, S.L. and all its subsidiaries.
- c) **Collaborators:** members of the Board of Directors or Management, employees, workers or temporary employees, employees under a collaboration agreement and the rest of the individuals under the hierarchical subordination of any of the aforementioned.

2. Introduction and objectives

The purpose of this Global Marketing Policy (the “**Policy**”) is to establish a general framework to regulate the relationship of Uriach with each of the different market players with whom it interacts.

Uriach's mission is to improve the health, quality of life and well-being of people all over the world by means of products and services that uphold high standards of quality, ethics and transparency in the way they are marketed.

It is of great importance to Uriach that all stakeholders always act on the basis of sustainable and ethical criteria, guaranteeing transparency and minimum environmental impact in each of their actions.

Uriach, therefore, undertakes to:

- i. **Compliance with the law:** Act and compete in compliance to all applicable laws in the territories which Uriach operates, promoting free competition, and avoiding any conduct that may constitute an abuse.
- ii. **Ethical Marketing:** Promote the appropriate marketing, promotion, and advertising of its products, ensuring that such activities, which are aimed at both healthcare professionals and the general public, are lawful and truthful.
- iii. **Sustainability:** Ensure a rational use of resources, respect the environment and act with sustainability and ethics criteria as a fundamental basis for each of its actions.

This Policy represents Uriach’s commitment to comply with the laws and ethical values upheld in our Code of Ethics and further internal policies and protocols that may be developed.

3. Scope and application

Within the scope of application of this Policy, we can distinguish the following:

- **CORPORATE SCOPE** - This Policy is applicable to all companies belonging to Uriach, as well as to subsidiaries and invested companies over which Uriach has effective control or holds positions in the management bodies.
- **PERSONAL SCOPE** - This Policy is applicable to all levels of the organisation, including management bodies, senior management, supervisory bodies, all staff, and any person who may be considered as a member of Uriach.
- **RELATIONAL SCOPE** - This Policy is applicable in relations with agents, influencers, ambassadors, agencies or any other third party involved in the marketing and commercialization of any of the Uriach's products.
- **GEOGRAPHIC SCOPE** - This Policy is applicable to the activities that the company carries out in any geographical area, both locally and internationally.

This Policy will be available on Uriach's Intranet to all Collaborators. It will also be communicated to all directors, senior managers and any person representing Uriach, who must undertake to comply with it.

4. Principles

Uriach aims to use this Policy to convey the principles that must be present in all Uriach's activities and to send out a clear message of opposition to the commission of any unlawful or unethical act.

In this regard, the main marketing principles that will govern Uriach's activity are:

- Zero-tolerance policy with regard to any conduct that could constitute an infringement of antitrust rules. In the event of a breach, Uriach will take the appropriate legal measures to address the situation.
- Part of Uriach's culture is based on innovation and transformation. Therefore, it is of vital importance to protect investment in intellectual and intangible assets, which in turn is a determining factor in maintaining Uriach's competitiveness. In all Uriach's relationships with suppliers and customers, obligations about the protection of intellectual property assets or trade secrets must be properly regulated.
- The promotion and advertising of Uriach's products shall comply with the requirements of good faith and good business practice, regardless of their content, the dissemination channels or the manner they are adopted.

By way of example, and by no means exhaustive, all Uriach's marketing actions shall be in accordance with the following principles:

- Diversity and Inclusive Language: All marketing materials and communications shall promote diversity and inclusivity by using language that respects and represents diverse backgrounds, cultures, and identities.
- Environmental Impact: Marketing initiatives should strive to minimize their environmental impact. This includes using sustainable materials, minimizing waste generation, and promoting eco-friendly practices throughout the marketing process.
- Transparency: Uriach is committed to transparency regarding the potential negative impacts of its products on health and the environment. Marketing campaigns shall provide accurate and clear information about any potential risks associated with the use or consumption of the products as well as the impact of the manufacturing and commercialisation process of its products to the environment.
- Ethical Advertising: All marketing activities shall adhere to ethical advertising standards, promoting honest and truthful representation of Uriach's products and services. Misleading or deceptive advertising practices are strictly prohibited.
- Data Protection: Marketing campaigns must comply with applicable data protection laws and respect consumer privacy. Personal information shall be handled securely and in accordance with the local and regional data protection regulations.
- Social Responsibility: Marketing initiatives should align with Uriach's commitment to social responsibility as stated in our Code of Ethics. This includes supporting social causes, engaging in philanthropy, and promoting ethical business practices.
- Compliance with Laws and Regulations: All marketing actions must comply with local, regional, and international laws, regulations, and industry standards governing marketing practices. Among others, some of the local and international legislation applicable to Uriach in the territories in which it has a direct presence are specified in Annex 2.

5. Uriach's relationship with third parties

Prior to working with any agent, influencer, ambassador, agency or any other third party involved directly in the marketing and commercialization of any of the Uriach's products (hereinafter the "Agent"), the procedure to be followed by any Collaborator will be as follows:

- Signature of a Non-Disclosure Agreement.
- Presentation of values and history of Uriach.
- Introduction of brand and product strategy, together with the brand insights. If necessary, delivery of product samples and promotional materials.
- Sending of the "DO & DON'Ts" handbook (attached as Annex 1) in order to convey and impose good practices throughout marketing activities.
- Formalization of a contract in which, among others, the following aspects will be covered: obligations, payment, compliance with Uriach's Code of Ethics, intellectual property rights.

6. Non-compliance / Compliance Channel

Uriach provides all its stakeholders with a communication channel that will allow them to report, with strict confidentiality and (if requested) anonymously, any suspected wrongdoing and breaches of our Code of Ethics, internal policies (as the current one) and all applicable regulations.

All Collaborators have a duty to comply with this Policy and must report through the Compliance Channel any breaches of the ethical marketing principles established by this Policy and the regulations that develop it.

Non-compliance will be grounds for disciplinary action. In the event of any unlawful conduct, Uriach will apply, in a proportionate manner, the corresponding disciplinary measures in accordance with the regulations in force.

Any stakeholder who wishes to access our compliance channel can do so through the Corporate Governance section of Uriach's website. By including the compliance channel within our Corporate Governance section, we aim to promote transparency and encourage stakeholders to come forward with any concerns related to breaches of our Code of Ethics, internal policies and all applicable regulations.

7. Review, approval, communication, dissemination, and updating of the Policy

The Global Marketing Direction will deal with questions raised by Uriach Collaborators regarding compliance with the Policy, as well as suggestions on how the Uriach can improve the Policy. This Policy shall be periodically reviewed to adapt it to any changes that may be appropriate from time to time.

This Policy shall be approved by the Chief Marketing Director and shall be communicated and disseminated to all hierarchical levels of the organisation.

The Global Marketing Direction shall organise training sessions on this Policy when necessary.

ANNEX 1

DO's & DON'Ts AGENTS

1. INTRODUCTION

This document is intended to serve as a guide for all employees, agents, influencers, ambassadors, agencies or any other third party involved in the marketing and commercialization of any of the Uriach's products ("**Agent**") in order to generate good practices in the process of any advertising material or campaign about the products and/or services of Uriach.

In this regard, as an Agent of Uriach, we want to provide you with a detailed list, not exhaustive, of good practices in the configuration of messages, publications and activities that you can perform in order to adapt your content to the current legislation on advertising, as well as commercial agreements with Uriach.

Below, we provide a list of DO's & DON'Ts which is structured as follows:

- General Commitments
- Commitments related to Uriach's image
- Commitment to transparency
- Commitment to Food and Food Supplement Advertising
- Commitment regarding the Advertising of Cosmetics and Personal Care Products

And, above all, when in doubt, ask us! We will help you.

2. DO'S AND DON'TS

a. General Commitments

- **COMMITMENT** to respect current legislation in each country and especially the values, rights and principles recognised in the European Convention on Human Rights.
- **NO** form of discrimination or incitement to violence will be suggested, nor will it encourage illicit, illegal or socially reprehensible behaviour.
- **COMMITMENT** to comply with and observe the applicable advertising and sectorial regulations.
- **NO** false, inaccurate, unbalanced, dishonest or impartial information will be provided.
- **COMMITMENT** to respect the image rights, intellectual and industrial property rights or any other rights of third parties.
- **NO** copying or use of unauthorised third-party content (e.g. trademarks, photographs, music, illustrations, videos, etc.).
- **COMMITMENT** to disseminate truthful and respectful information and to ensure at all times that the content is truthful, accurate and relevant.
NO information will be published, or its publication will be omitted, to the extent that it could mislead its recipients or content that could undermine the reputation of third parties. Comparative advertising is not recommended, even if the other party is not mentioned, nor is the use of superlative expressions such as "the best" or "No. 1".

b. Commitments related to Uriach's image

- **COMMITMENT** to respect at all times the good name and reputation of Uriach and its respective products and/or services.

- **NOT** to publish images, videos, posts or comments or make any public statements or actions that may have a negative impact on Uriach or its products.
- **COMMITMENT** to use the Uriach's trademarks without misrepresenting them.
- **NOT** to use outdated corporate logos or images.
- **COMMITMENT** to respect the confidentiality of Uriach's information to which they may have access.
- **NOT** to disclose any Uriach's confidential information.
- **COMMITMENT** to guarantee certain exclusivity and prominence to Uriach's products.
- **NOT** to carry out or avoid the campaigns of Uriach's direct competitors during the same period of time.

c. Commitment to transparency

- **COMMITMENT** to identify promotional actions expressly, sufficiently and easily as advertising in accordance with applicable regulations and codes of conduct. The use of indications such as "advertising", "in collaboration with" or "sponsored by" is recommended.
- **DO NOT** use generic indications (e.g. "information", "legal" or similar), or unclear indications or abbreviations (such as "Colab", or "sp" or "ad").

d. Commitment to Food and Food Supplement Advertising

- **COMMITMENT** to make use of expressly approved nutrition claims. For example, "Source of fibre", "Low fat", "No sugars", "No added sugars", etc.
- **DO NOT** make unapproved claims that may mislead the consumer into believing:
 - o That the product prevents or treats diseases, pathologies.
 - o That it improves sporting, physical, intellectual or sexual performance.
 - o That their health may be affected if the product is not consumed (exploiting consumer fear).
 - o It should not be supported by recommendations from doctors or by health or scientific endorsement.

e. Commitment regarding the Advertising of Cosmetics and Personal Care Products

- **COMMITMENT** to use truthful, honest and unbiased statements based on verified data. Such as, for example:
 - o Relief of scalp irritation
 - o Moisturising
 - o Soothing action for sensitive skin
 - o Brightening effect
 - o Repairs and nourishes the skin
 - o Complete hygiene
 - o Anti-hair loss (alopecia)
 - o Anti-ageing (anti-wrinkle)
 - o Cellulite
 - o Blackheads and blackheads
 - o Dermatological, Atopic skins
 - o Promoting peripheral vasodilatation
 - o Massage with cosmetic indications

- Acne-prone skin
- **DO NOT** make health claims such as suggesting that a product is intended to treat, cure or prevent any disease or symptom:
 - Disinfectant action: antiseptic, bactericidal, fungicidal, protection against contagion, prevent bacterial proliferation, etc.
 - Skin and hair diseases and conditions: cures or treats acne, eczema, psoriasis, boils, itching (except anti-dandruff), dermatitis, scarring, inflammation, burns (except to prevent burns), haemorrhoids, nappy rashes (except to prevent rashes).
 - Action on blood circulation: cures, treats or prevents varicose veins, swollen legs, promotes general circulation.
 - Action on obesity: slimming.