

**Your gut  
tells you  
something  
is wrong.**

Let's do the right  
thing together.

**Code of Conduct and  
Ethics Quirónsalud Group**

# Contents

Introduction to Quirónsalud Group	3
Foreword from the President of Quirónsalud Group	4
Foreword from the Fresenius Group Executive Committee	5
The Code of Conduct at Quirónsalud, part of the Fresenius Group	6
Key Issues Regarding the Code of Conduct and Ethics	8
Our corporate principles	10
<b>WE SERVE PATIENTS BEYOND EXPECTATIONS</b>	<b>12</b>
Applying the highest ethical standards in the healthcare sector	13
Safety- and hygiene- conscious management of patients	14
No compromises in the quality of medicine, care, products and services	16
<b>WE CARE FOR EXCELLENCE</b>	<b>17</b>
No involvement in bribery and corruption	18
Combating money laundering and the financing of terrorism	19
Transparent management of sponsorship activities and donations	20
Transparent management of gifts and entertainment	21
Disclosure of conflicts of interest	22
Compliance with Antitrust and Competition laws	24
Compliance with Customs and Trade Regulations	25
Accurate and Transparent Accounting	26
<b>WE BRING HEALTHCARE INNOVATION TO PEOPLE</b>	<b>27</b>
Pioneer in Innovation and Development	28
Responsible Use of Artificial Intelligence	29
<b>WE LIVE THE POWER OF ONE TEAM</b>	<b>30</b>
Respect for Human Rights	31
Promoting of Equal Treatment and Opportunities for all	32
Non-tolerance of discrimination	33
Safe Working Conditions	35
Transparent Communication – Both Internal and External	36
<b>WE ACT TODAY FOR A BETTER TOMORROW</b>	<b>37</b>
Responsible Interaction with the Environment	38
Strengthening Confidence through Data Protection	39
Protecting the Digital Environment through Cyber Security	40
Protection of Confidential Company Information	41
Protection of Company Assets	42
<b>SPEAK-UP – OUR REPORTING CHANNELS</b>	<b>44</b>

# Introduction to Quirónsalud Group

Quirónsalud<sup>1</sup> Group is the leading group in the provision of healthcare services and occupational risk prevention in Spain, and one of the international benchmarks in the health sector.

With a network of more than 50 hospitals, over 100 specialized centers, and a presence in Latin America, Quirónsalud offers comprehensive care focused on healthcare quality, medical innovation, and personalized patient treatment. Its areas of activity include hospital medicine, outpatient care, occupational risk prevention, biomedical research, and the training of healthcare professionals.

Since 2017, Quirónsalud has been part of the Fresenius Group, one of the world's largest healthcare groups, headquartered in Germany, specializing in medical care and pharmaceutical products. This integration has strengthened Quirónsalud's commitment to the highest international standards of quality, ethics, and sustainability in healthcare.

<sup>1</sup> For the purposes of this document, the term Grupo Quirónsalud shall be understood to refer to the group of the following companies, as well as their subsidiaries, including those that may be incorporated into the group of companies in accordance with Article 42 of the Spanish Commercial Code: Helios Healthcare Spain, SLU, IDCQ Hospitales y Sanidad, S.L.U., Quirón Prevención S.L.U., Health Diagnostic, S.L.U., IDCQ Actividad Internacional, S.L.U., IDCQ Inmuebles Hospitalarios, S.L.U., and Servicios Personas y Salud, S.L.U.

# Foreword from the President of Quirónsalud Group

Dear Professionals and Collaborators of the Quirónsalud Group,

I am pleased to present the Fresenius Group's Code of Ethics, which the Quirónsalud Group has adopted as part of our ongoing commitment to integrity, transparency, and social responsibility.

Since our founding, we at Quirónsalud have understood that clinical excellence must always go hand in hand with impeccable ethical conduct. Our commitment extends beyond applying cutting-edge technology and advanced medical knowledge—it also encompasses how we treat our patients, their families, and every professional who forms part of our team. In every consultation, every procedure, and every act of care, we carry the responsibility of those who place their trust in us.

This Code of Conduct and Ethics reaffirms our dedication to transparency, fairness, and respect. It promotes a just and inclusive work environment, free from discrimination and harassment, and aligned with the values of sustainability and good governance that today's society rightfully expects. Ethics is not an accessory to our healthcare mission—it is its very foundation.

As part of the Fresenius Group, we share core principles with one of the world's leading healthcare organizations, while tailoring our approach to the legal, social, and cultural context of our country. This Code is designed to guide us, resolve doubts, and support sound decision-making, even in complex situations. Its contents have been carefully adapted to the specific realities of the Spanish healthcare environment.

I trust this document will serve as a living and practical tool. I encourage you to make it your own—consult it, share it, and, above all, put it into practice every day. Only through ethical, consistent actions can we continue moving forward toward our ultimate goal: delivering healthcare with humanity, excellence, and unwavering commitment.

Kind regards,

Dr. Víctor Madera

President of Quirónsalud Group

# Foreword from the Fresenius Group Executive Committee



Dear colleagues,

Trust is our strongest currency. As a global healthcare group, we enjoy the trust of our patients, clients, partners, investors, and the general public. Millions of people entrust us with their health and lives. That is why it is important that we always act ethically and legally to justify the trust placed in us. The Fresenius Code of Conduct is designed to help us do the right thing.

Our Code of Conduct applies to all employees of the Fresenius Group, that is, 175,000 colleagues working in more than 80 countries, including Quirónsalud Group.

With this, we want to achieve one thing: wherever we work at Fresenius, each and every one of us must act according to the same standards.

The Code of Conduct is based on the 5 principles of Fresenius. They describe how we see ourselves. We not only care about ensuring the quality of our products and services, but also about how we treat and collaborate with each other, both inside and outside the company.

In our Code of Conduct, we address issues that are increasingly important to society and the healthcare sector. This also includes the responsible use of artificial intelligence.

We strongly recommend that you read the Code of Conduct. Familiarize yourself with its content. The Code of Conduct should support you in your daily work, especially in difficult situations. If you have any questions or doubts about the Code of Conduct, we encourage you to contact your Compliance Department or use the available channels.

Your behavior helps strengthen our corporate culture and ensure the long-term success of Fresenius.

Fresenius is **committed to life**: we improve people's lives. This document helps us meet this demanding standard. Whenever, wherever.

The Executive Committee of the Fresenius Group

# The Code of Conduct at Quirónsalud, part of the Fresenius Group

## **What is our Code of Conduct and why do we need it?**

The Code of Conduct guides our actions and decisions in accordance with our corporate principles. It serves as a moral compass for our daily activities, especially in challenging situations. Alongside our binding business guidelines for specific areas and topics, the Code protects both individuals and the organization.

It also reflects our commitment to the “tone at the top”—exemplary ethical leadership from senior management that promotes responsible conduct at every level of the organization. Ethics, respect, responsibility, and excellence must guide all our actions, not just as a legal obligation but as a fundamental pillar of the trust placed in us by our patients, professionals, and society.

For its implementation within the Quirónsalud Group and its application to the individuals identified in the following section, “Who must comply with the Code of Conduct?”, the Code has been adapted to align with the key aspects of Spanish regulations—particularly those relating to corporate criminal liability, whistleblower protection, and a culture of compliance.

## **Who must comply with the Code of Conduct?**

The content of this Code of Conduct applies to all “Professionals” of the Quirónsalud Group. This includes all managers, employees, collaborators, and external personnel—whether providing services through service contracts, temporary employment agencies, or other means—who may represent Quirónsalud in the marketplace and/or before third parties.

The Code also applies to any individual or legal entity that enters into a contractual relationship with Quirónsalud. Adherence to the Code is a mandatory requirement for our collaborators, suppliers of goods and/or services, contractors, and subcontractors, all of whom must explicitly commit to its compliance.

### **What happens if we do not follow the Code of Conduct?**

Professionals who act unlawfully or violate internal rules harm not only themselves but also the Quirónsalud Group and the Fresenius Group. Therefore, any known violation will be investigated.

Violations of laws, internal regulations, or the principles and rules outlined in this Code may result in disciplinary action in accordance with labor laws and the Group's internal procedures. This is without prejudice to any labor, civil, commercial, administrative, or criminal liability as established by law.

These measures will be applied according to the severity of the violation and will always uphold the right to defense and the presumption of innocence. Sanctions may range from formal warnings to termination of business, service, or collaboration agreements, in addition to other legal consequences. If the facts may constitute a criminal offense, they will be reported immediately to the Public Prosecutor's Office or the relevant police authority.

The Quirónsalud Group ensures a fair, proportionate, and non-discriminatory application of the disciplinary system, reinforcing its commitment to ethics and integrity.

# Key Issues Regarding the Code of Conduct and Ethics

## **The Code of Conduct and Ethics as a Cornerstone of the Crime Prevention Model**

This Code is the foundational rule of the Quirónsalud Group's Crime Prevention Model, in accordance with the Spanish Criminal Code and the guidelines of the State Attorney General's Office. It defines the principles and behavioral guidelines that govern the actions of all individuals within the organization, helping to prevent violations—including those that may constitute criminal offenses—in the course of the Group's operations.

As such, the Code serves as a reference framework for designing, implementing, and overseeing the Crime Prevention Model. It provides guidance for identifying ethical and legal risks, resolving conduct-related dilemmas, and ensuring actions align with corporate values. The Code is supported by specific policies, procedures, and controls that enhance the effectiveness of the model and ensure its ongoing adaptation to regulatory changes.

Adopting and complying with the Code at all levels of the organization is essential to fostering a true culture of integrity, reducing risk exposure, and strengthening the trust of patients, professionals, suppliers, institutions, and society at large.

## **The Role of the Risk and Compliance Committee**

The Risk and Compliance Committee of the Quirónsalud Group is responsible for overseeing compliance with the Code. This collegial body operates with functional autonomy and sufficient resources to perform its duties independently, impartially, and effectively.

Its mission is to ensure the proper implementation, monitoring, and continuous improvement of the Ethical and Regulatory Compliance Model, which includes the Crime Prevention framework.

The Committee's main responsibilities include: interpreting the Code's provisions, resolving questions about its application, promoting training initiatives, analyzing potential breaches, proposing preventive and corrective measures, and fostering a culture of integrity and transparency in alignment with the Group's values and Spanish legal standards.

The Committee also manages the Internal Information System, whose core mechanism is the Whistleblowing Channel, described in the section "12. Raise Your Voice: Our Whistleblowing Channels."

The Risk and Compliance Committee meets regularly and reports its activities and findings related to ethics and compliance to the Group's Governing and Management Bodies, ensuring that ethical responsibility is shared and upheld throughout the organization.



## **Continuous Training and Commitment to Integrity**

Quirónsalud provides continuous training programs in ethics, integrity, regulatory compliance, and risk prevention—including criminal risk prevention—for all its professionals. These programs are tailored to the roles and responsibilities of each department and are regularly updated to reflect legal changes and best practices.

A culture of integrity is also fostered through internal communications, workshops, awareness campaigns, and periodic assessments of the organization's ethical climate.

All professionals are required to understand and comply with this Code and to actively support its implementation within the Quirónsalud Group. They must also attend and participate in any training sessions required to ensure a proper understanding of the Code.

The Group ensures the proper dissemination of the Code of Conduct and Ethics by publishing it on the corporate website and internal intranet.

If there are any doubts about the content of the Code, professionals may contact their supervisors, the Compliance Department, or the Risk and Compliance Committee.

## **Approval and Review of the Code**

This Code enters into force and becomes applicable to the individuals and legal entities specified in the section "Who must comply with the Code of Conduct?" on the day following its approval by the Group's Governing Body. It will be reviewed and updated regularly by the Risk and Compliance Committee to incorporate best practices, regulatory developments, and feedback from stakeholders involved in its compliance.

# **Our corporate principles**

The background of the slide is a gradient from dark blue on the left to light blue and green on the right. At the bottom, there are several glowing, wavy lines in shades of blue and green, creating a sense of motion and energy.

# FRESENIUS PRINCIPLES



## WE CARE FOR **EXCELLENCE**

No compromise on quality.  
True north in mind.



## WE LIVE THE POWER OF **ONE TEAM**

Respectful collaboration.  
Empowering responsibility.



## WE SERVE **PATIENTS BEYOND EXPECTATIONS**

Bold in our ambitions.  
Turning ideas into actions.



## WE ACT **TODAY** FOR A BETTER **TOMORROW**

Over 100 years of  
heritage.  
Mindful of future  
needs and resources.



## WE BRING **HEALTHCARE INNOVATION TO PEOPLE**

Learning with our customers  
and partners.  
Pushing therapies to the  
next level.

Our corporate principles play a decisive role in the success of our company: they are an expression of what the Quirónsalud Group stands for and what it means to work for Quirónsalud. They are the common maxim of our actions. They guide us on our way to becoming the leading healthcare group that people trust, because they combine cutting-edge technology with human care to create treatments of a superior level.

**We serve  
patients beyond  
expectations**



**WE SERVE  
PATIENTS BEYOND  
EXPECTATIONS**

# APPLICATION OF THE HIGHEST ETHICAL STANDARDS IN THE HEALTHCARE SECTOR

Healthcare ethics is about moral values in medicine. Our patients trust us to respect and protect their health, well-being and privacy. In addition, adherence to ethical standards promotes quality healthcare and contributes to improved patient outcomes. By applying the **highest ethical principles**, we reinforce our credibility and reputation as a trusted provider of patient healthcare solutions.

We integrate the principles of medical ethics into our daily work by treating patients with respect and addressing ethical conflicts with sensitivity..

## LET'S DO THE RIGHT THING TOGETHER

We firmly root the principles of medical ethics in our daily work. This means that we treat patients with respect and empathy, respect their self-determination and always communicate appropriately and transparently. In addition, we constantly educate ourselves on ethical issues and best practices. Our aim is to make decisions based on the best scientific knowledge and to always give priority to the well-being of patients.

We recognize potential ethical conflicts and treat ethical issues with sensitivity.

In conflict situations that may arise due to differing values, we work together to find a solution that is understandable and fair to all. In these situations, we have the option of calling on the support of ethics committees.

We all contribute to ensuring excellent and sustainable patient care. For us, economic efficiency and ethics are not contradictory, but complementary. We use available resources responsibly and economically, to the best of our knowledge and belief.

# SAFETY- AND HYGIENE- CONSCIOUS MANAGEMENT OF PATIENTS

**Patient safety** and hygiene are two fundamental pillars of healthcare that are closely related. Patient safety refers to all measures and practices aimed at protecting patients from avoidable harm while receiving medical care. **Hygiene**, on the other hand, includes all measures to prevent the spread of infections and to ensure a clean and safe environment for patients and medical staff. The safety of patients in our clinics and the safety of all employees is our top priority. Having high standards in these areas leads to better therapeutic outcomes, fewer complications and improved patient satisfaction and experience. In addition, these standards contribute significantly to reducing hospital-acquired infections. By adhering to strict hygiene protocols and safety standards, we can minimize the spread of infections and ensure the health and safety of everyone involved. They also play an important role in protecting medical staff and contribute to our reputation and credibility as a healthcare group.

In all our decisions, we are guided first and foremost by the safety and well-being of our patients.

## LET'S DO THE RIGHT THING TOGETHER

We ensure that every decision we make and every action we take serves the well-being and safety of our patients. To this end, we do what experience shows to be good and sensible for patients.

We always comply with legal and internal regulations on safety and hygiene standards. During invasive procedures, we ensure the safety of our patients by following established procedures.

It is very important to us to take an open and transparent approach to safety-related issues. This also means talking about mistakes or critical events that could have led to accidents. We learn from mistakes and work to ensure that they do not happen again. We report all patient safety incidents through established reporting channels and actively contribute to preventing future risks.

We are committed to communicating in an appropriate and timely manner all information we receive on product risks, adverse events and product complaints, following established internal procedures.

**Even the  
best of  
us make  
mitsakes.**

A pink wavy line that underlines the word "mitsakes." in the text above.

Let's talk  
about them.

# NO COMPROMISES IN THE QUALITY OF MEDICINE, CARE, PRODUCTS AND SERVICES

Products and services must meet legal and quality requirements in order to be used safely for our patients. These requirements may be global standards, such as DIN, JCI or ISO/UNE standards, or internally defined quality characteristics. Failure to perform due diligence by our employees who work directly in the manufacture and testing of products and in the provision of medical services in production facilities, care centers and clinics can have particularly serious consequences for our patients. Measures to ensure the **quality and safety of our products and services** are defined in the procedural instructions and monitored accordingly.

We rely on harmonized processes, meet the highest quality standards and ensure transparency in case of defects.

## LET'S DO THE RIGHT THING TOGETHER

We strive to harmonize specifications and processes to ensure the highest standards along the entire value chain and throughout the entire treatment process.

If we recognize defects in our products, services or processes, we make them transparent and take prompt action to protect our patients.

Our patients receive all important information about the treatment process so that they can make an informed and free decision. If necessary, we obtain their express consent and respect their living wills and decisions about their data.

We record clinical and non-clinical records and documents in a timely, complete and transparent manner in designated systems.

We handle high-risk drugs and devices with the utmost care and treat our patients responsibly, based on what is good and sensible based on experience.

Each sales organization ensures that responsible persons are available on site in the event of an emergency, such as a product recall, or in connection with safety information. In addition, we store and distribute all products in perfect quality.



# We care for excellence



WE CARE FOR  
**EXCELLENCE**

# NO INVOLVEMENT IN BRIBERY AND CORRUPTION

**Corruption** occurs when someone abuses his professional position or power to obtain an illicit advantage for himself or others. **Bribery** is a form of corruption in which someone grants another person an advantage in order to be favored in a decision. Corruption has serious consequences, both for Quirónsalud and for our patients, employees, families and society. It is a practice that wastes valuable resources instead of promoting sustainable development or high-quality treatment or research. It prioritizes private interests at the expense of the company and our stakeholders. Bribery and corruption harm free competition and economic development and can have serious legal, financial and reputational consequences for Quirónsalud and its employees. To maintain and reinforce trust in us as a company, we reject all forms of corruption and do not engage in such activities. We avoid all situations in which even the slightest hint of corruption may arise.

We reject bribery and corruption and make our decisions objectively.

## LET'S DO THE RIGHT THING TOGETHER

We do not offer, grant or accept any illegal or improper benefits to ourselves or others, financial or otherwise. Bribes intended to expedite a business transaction are also strictly prohibited in our company. The prohibitions apply to direct and indirect actions through third parties that are intended to improperly influence an activity or decision. We take special care when dealing with public officials and healthcare professionals, as they are subject to particularly strict laws. We are committed to ensuring that decisions are made impartially and objectively, especially in sensitive business transactions involving large groups of people.

The selection of our business partners is based on qualitative, economic and ethical criteria. We only work with partners whose values are in line with our corporate principles and whose cooperation has not been influenced by corruption.

To ensure that we always act correctly, we have introduced various preventive measures. These include risk-based due diligence reviews, guidelines and training.

If authorities or other competent bodies carry out investigations, we cooperate and coordinate in advance with the responsible management and the Compliance Department.

# COMBATING MONEY LAUNDERING AND THE FINANCING OF TERRORISM

**Money laundering** is the process by which illegal proceeds from crime are disguised as legal money and channeled back into the economy. **Terrorist financing** refers to the processing of assets for the direct or indirect financing or support of terrorist activities. As a healthcare group, Quirónsalud is affected by the applicable anti-money laundering and anti-terrorist financing laws. We are therefore aware of the risks of money laundering and terrorist financing and are committed to actively combating them.

We are committed to transparency in financial transactions.

## LET'S DO THE RIGHT THING TOGETHER

We pay attention to unusual payment behavior and follow our internal guidelines and processes to prevent money laundering and terrorist financing. This also means that we prohibit certain cash transactions, conduct due diligence where necessary and report suspicious activity to the relevant authorities.

If we detect indications of money laundering or terrorist financing in a business transaction, we immediately inform the Compliance Department, which assesses the risks and takes measures to protect the company.

We participate in training courses on the secure handling of financial transactions and possible suspicious circumstances if it is relevant to our work.

# TRANSPARENT MANAGEMENT OF SPONSORSHIP ACTIVITIES AND DONATIONS

**Sponsorship activities** are financial or material support provided in exchange for services in order to increase brand awareness. **Donations**, on the other hand, are voluntary contributions in kind or in cash with no expectation of anything in return. Donations and other contributions to political organizations may damage the public image of Quirónsalud. Sponsorship activities and donations can cause considerable reputational damage as a result of supporting controversial or ineffective projects. Donations to political institutions, organizations or individuals carry the risk that the donation may be intended to exert unfair influence on them, which in turn may damage our reputation or lead to legal disadvantages. Sponsorship of our business activities by third parties may have a negative impact on our business decisions if performance and consideration are not in harmony. This must also be taken into account when carrying out our sponsoring activities.

We carefully scrutinize sponsorship activities and donations and do not unduly influence the sale or purchase of our products and services.

## LET'S DO THE RIGHT THING TOGETHER

We carefully review the acceptance and allocation of sponsorship activities and donations. Donations are intended exclusively for charitable purposes and not for operating expenses.

Our donations and sponsorship activities are never carried out with the aim of unduly influencing the sale or purchase of Quirónsalud products or services.

We do not make donations to political organizations, parties, politicians or other individuals running for political or public office, with the exception of legal support for political action committees (PACs) in the United States.

All donations must comply with applicable internal and external regulations, particularly in terms of authorization, documentation and taxation.

# TRANSPARENT MANAGEMENT OF GIFTS AND ENTERTAINMENT

Gifts are **material or immaterial benefits** to which you are not legally entitled and which are offered or made to us or which we offer to third parties. Gifts can come from business or cooperation partners or from patients. Clear guidelines and transparency regarding gifts and invitations help to promote fair and professional business behavior. Acceptance of gifts can lead to conflicts of interest, and unauthorized granting of advantages or bribery could be criminally prosecuted in many countries. It is therefore important to regulate gifts and entertainment appropriately in order to maintain trust in ourselves, our business partners and the public.

We do not allow ourselves to be unethically influenced by gifts or invitations and do not offer them to unduly influence business decisions.

## LET'S DO THE RIGHT THING TOGETHER

We ensure that no inappropriate dependencies, obligations or personal commitments arise. We do not allow ourselves to be unduly influenced by gifts or other benefits in our business decisions and actions and reject such benefits if they jeopardize the objectivity and independence of our decisions.

We do not offer gifts or advantages to improperly influence decisions. Nor do we demand, accept or grant illegal, socially unacceptable or unethical benefits.

Gifts, business meals or invitations to attend healthcare professionals or public officials are subject to particularly strict rules, which we always respect.

# DISCLOSURE OF CONFLICTS OF INTEREST

By **conflicts of interest**, we mean situations in which decisions to be made in the interest of patients or the company are unduly influenced by personal interests, whether material or immaterial. Conflicts of interest can have serious economic and legal consequences. They can undermine confidence in our decisions and damage our company's reputation in the long term.

We must avoid situations in which our personal interests may conflict with those of Quirónsalud.

## LET'S DO THE RIGHT THING TOGETHER

It is important to separate private interests, such as personal, social, financial, religious or political convictions, from the interests of the company in order to be able to make decisions objectively and without undue influence. In a conflict situation, the interests of Quirónsalud must always take precedence.

A conflict of interest may arise if we deviate from the professional performance of our duties by engaging in other activities, even outside the company, or if we use company time or resources for non-business purposes.

Our private activities must not conflict with our professional activities.

If we recognize potential conflicts of interest, we openly disclose them to our superiors or other responsible persons. Together we discuss how we can avoid these conflicts, resolve them or take them into account in our business decisions.

If secondary employment or self-employment could conflict with the interests of Quirónsalud, we obtain authorization in accordance with our employment contract or our internal guidelines, if required by local law.

**Not all  
risks are  
obvious.**

Show them to us.

# COMPLIANCE WITH ANTITRUST AND COMPETITION LAWS

**Antitrust and competition laws** prevent illegal agreements or monopolistic practices from eliminating or impairing the operation of competition or harming consumers. Violations of antitrust and competition laws can have serious legal, financial, reputational, and personal consequences and significantly harm our future competitiveness. By behaving fairly in competition, we all contribute to Quirónsalud being perceived as an honest partner.

We determine our business strategies independently and do not participate in cartels, anti-competitive agreements or concerted practices that unlawfully restrict competition.

## LET'S DO THE RIGHT THING TOGETHER

We achieve our success through high-quality products and services and strong market competition, always complying with applicable antitrust and fair competition laws.

We always determine our business strategies independently and never participate in cartels, anti-competitive agreements or concerted practices that unlawfully restrict competition. This applies in particular when working with our competitors, customers and suppliers.

We do not abuse a dominant market position, for example, by hindering competitors or exploiting customers. We are aware that we are exposed to antitrust risks, especially in our relationships with companies operating in the same market. We therefore participate in training courses to recognize these risks and deal with them correctly.

We avoid exchanging confidential business information directly or indirectly with competitors, unless permitted by law.



# COMPLIANCE WITH CUSTOMS AND TRADE REGULATIONS

All transactions, regardless of whether they are cross-border or take place within the same country, may be subject to national and international **customs or trade regulations** (including import or export controls). Quirónsalud operates worldwide and handles imports, exports and transits of various goods on a daily basis. In order for goods to clear customs on time, all shipments must be properly prepared under expert guidance to ensure compliance with national and international regulations. Customs laws and trade regulations apply regardless of quantity, type of material and mode of transport. Failure to comply with these regulations can result in significant reputational damage, civil and criminal liability and loss of import or export privileges.

We pay attention to and ensure compliance with all customs and trade regulations.

## LET'S DO THE RIGHT THING TOGETHER

We ensure that we comply with national and international laws and regulations, including import and export controls and embargo regulations.

Before we get in contact with new business partners, we check whether they are on national or international sanctions lists.

Before importing or exporting goods, software or technology – whether physical or electronic – we also ensure that no special licenses are required and that there are no trade restrictions. Some countries are subject to comprehensive foreign trade controls – also known as embargoes or sanctions – which we consider before every transaction.

We ensure that all information we provide is accurate and complete.

In our day-to-day business and when adapting our processes, we ensure that we always comply with all customs and trade regulations.

# ACCURATE AND TRANSPARENT ACCOUNTING

**Accounting** is used to record, organize and manage financial transactions. Our investors make their decision to support us as a company based on the published financial and non-financial information. In order to do this, they need a clear and transparent basis for decision-making.

We comply with the principles of proper accounting.

## LET'S DO THE RIGHT THING TOGETHER

It is important that we properly document, settle and record all business transactions. Each and every one of us contributes to ensuring that the principles of proper accounting are complied with. We ensure compliance by clearly defining and adhering to the necessary responsibilities, processes and controls.

We ensure that all necessary declarations and financial reports are submitted correctly and on time to the relevant authorities. We must retain all documents used to prepare a statement or financial report in an appropriate manner. We are also transparent and cooperate with the relevant supervisory authorities and other public bodies.

We ensure the accuracy of the information we provide for inclusion in a financial report that is signed or certified by officials and disclose any suspicions or questions regarding the accuracy prior to signing and filing or finalizing such financial report. We refrain from making false or misleading statements to obtain a payment to which Quirónsalud is not entitled.

Incorrect information in an official application or financial report can have legal consequences for both individuals and Quirónsalud.

**We bring  
healthcare  
innovation to  
people**



**WE BRING HEALTHCARE  
INNOVATION TO  
PEOPLE**

# PIONEER IN INNOVATION AND DEVELOPMENT

**Innovation** entails creating new ideas, products or processes or improving existing ones. Innovative approaches ensure better patient and healthcare provision, create added value or solve existing problems. **Development**, on the other hand, is the continuous process of growth and change in various areas. It involves expanding our range of products and services as well as refining and developing our existing products and therapies to meet the changing needs of patients and healthcare professionals. Innovation and development in the healthcare sector are subject to numerous legal and regulatory standards, including requirements relating to the ethically correct conduct of scientific and medical research and, in particular, clinical trials for the authorization of new and improved treatments, medical technology products, drugs and clinical nutrition.

We ensure the best possible care by integrating new, relevant discoveries into our products and therapies in compliance with the applicable regulations.

## LET'S DO THE RIGHT THING TOGETHER

We continuously monitor medical progress and integrate new, relevant findings into our products and therapies. Where necessary or useful, we adapt these to ensure the best possible care. To constantly improve our products and therapies, we conduct research, including clinical trials, to collect valuable data.

When developing our products and conducting studies, we always adhere to good clinical practice and all applicable laws, regulations and internal company policies.

It is particularly important to us to respect the intellectual property rights of others, such as patents, copyrights, design rights, utility model rights and trademark rights, and to use these only within the permitted scope.

# RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

**Artificial intelligence (AI)** is a technology that enables a machine to imitate and, in some cases, outperform human learning and understanding, human problem-solving, decision-making, creativity and autonomy. «Responsible use» means making the best possible use of this technology to enhance the quality of our products and services while fully respecting the dignity of our patients, customers, employees and business partners and ensuring a secure environment for the data processed. The capabilities of artificial intelligence make it possible to improve the quality of decisions and increase productivity. However, improper use of the technology harbors risks that can even directly affect the lives of those affected. Through binding principles for the responsible, ethical and safe use of artificial intelligence, we help to ensure that human dignity is our priority and that false, unfair, discriminatory or exclusionary outcomes are avoided.

We see artificial intelligence as an important tool for improving or enhancing the results of human decisions, but not as a substitute for them.

## LET'S DO THE RIGHT THING TOGETHER

We ensure fair and non-discriminatory results from the AI systems used.

We are committed to ensure that the data sets and processes of the AI used are transparent, that its capabilities and purpose are openly communicated and that AI-supported decisions are – as far as possible – explainable to those directly and indirectly affected.

We minimize potential negative effects and take responsibility for the AI system used and its results throughout the entire life cycle.

We ensure that the AI systems used are resilient to hostile attacks and potential misuse of the system, and we provide safeguards to minimize and respond to unintended or even harmful behavior.

Our strong commitment to confidentiality and data protection is essential for the safe and responsible use of AI.

We understand the social impact of AI and promote its use for the benefit of our society.

**We live the power  
of one team**



**WE LIVE THE POWER  
OF ONE TEAM**

# RESPECT FOR HUMAN RIGHTS

**Human rights** are universal rights. They apply to all people (simply because they are people) at any time and in any place, without distinction. They apply regardless of ethnicity, skin color, gender, language, religion, political or other beliefs, sexual orientation, origin or wealth. As a globally active healthcare group, we consider **respect for human rights to be a fundamental part of our corporate responsibility.** This applies to value creation, taking into account our ability to exert influence, to direct contractual partners and upstream in our value chain. Our human rights statement expresses our obligation and our firm commitment in this regard. The well-being of our employees is one of the core areas of our human rights due diligence. For us, this includes providing a safe and healthy working environment and respecting the right to freedom of association. We do not tolerate discrimination or exploitative working conditions, and have zero tolerance for child or forced labor. As a global healthcare group, we depend on many suppliers around the world. We expect them, too, to respect human rights and protect the environment through the efficient use of resources as the basis of our livelihoods.

We respect human rights and expect the same from our business partners and suppliers.

## LET'S DO THE RIGHT THING TOGETHER

We respect human and labor rights, report any violations and are committed to a safe and healthy working environment. We expect the same from our business partners and suppliers.

Respecting human rights is a shared responsibility that affects everyone – from members of the Management Board to managers, who we expect to set a good example, and from all employees to our business partners and suppliers.

# PROMOTING OF EQUAL TREATMENT AND OPPORTUNITIES FOR ALL

**Equal treatment and opportunities for all** means that everyone has fair access to the opportunities, development, resources and information they need to do their jobs, grow and develop. It is important to us that our employees are able to develop their full potential and bring their different knowledge, backgrounds, experiences and perspectives to the table. This leads to better problem solving, creativity and innovation; it enables us to make better decisions, increases our attractiveness as a company and helps us attract the talent we need to continue developing Quirónsalud.

We promote an environment of mutual respect and appreciation for diversity of thought, culture, perspectives and experiences.

## LET'S DO THE RIGHT THING TOGETHER

We promote an inclusive corporate culture in which all employees are valued and have the opportunity for further development.

Our employees are important to us, which is why we want to support them at all stages of their career at Quirónsalud and offer them equal opportunities. We want to promote equal opportunities by offering services and advice, such as occupational medicine and occupational health management, and with the help of career development programs. That is why we create flexible working environments that adapt to the individual needs of our employees at different stages of their lives.



# NON-TOLERANCE OF DISCRIMINATION

**Discrimination** means that a person or group is treated unfairly or unfavorably because of certain characteristics. It refers to offensive or threatening actions, as well as any form of sexual harassment or intimidation. We want all employees to be able to work with us without fear of harassment or discrimination. Therefore, we should all value each and every one of us having a safe, respectful and pleasant working environment.

We do not accept any form of discrimination in hiring or in the workplace.

## LET'S DO THE RIGHT THING TOGETHER

We do not accept any form of discrimination in hiring or employment based on ethnicity, skin color, gender, language, religion, political or other beliefs, sexual orientation, origin or wealth.

We also do not tolerate any of the following behaviors:

- Violence, threats or aggressive behavior.
- Intimidation or harassment of any person, including disrespectful, discriminatory, hostile, humiliating or offensive behavior, such as comments, jokes, gestures or physical contact.
- Promising preferential treatment or threatening unfavorable treatment based on an employee's response to sexual demands.
- Activities that are illegal or harmful to others.
- Illegal substances and drug abuse in the workplace.

Instead, we promote the following:

- Trust and open cooperation.
- Respectful behavior.
- Support for colleagues.
- An environment in which everyone can express their concerns without fear of retaliation.

Quirónsalud is committed to creating a work environment in which all employees feel safe, respected and supported. This is a responsibility we all share.

~~Not~~ my  
problem.

It's time to take  
responsibility now.

# SAFE WORKING CONDITIONS

**Working conditions** refer to various factors that characterize an employee's working situation. These include the working environment, safety measures and ergonomics. As a healthcare company, we prioritize the well-being and safety not only of our patients, customers and business partners, but also of our employees. We have introduced numerous management systems and measures throughout the company to protect our employees from accidents and work-related illnesses. A safe, healthy and productive workplace is therefore essential for us. The sustainable and safe organization of workplaces in accordance with applicable laws on occupational safety and our company policies create a healthy climate for our employees.

We contribute to the creation of a secure workplace.

## LET'S DO THE RIGHT THING TOGETHER

We have established company policies and working conditions to protect our employees from potential health risks in the workplace. As a company, we will always comply with the legal and company regulations on occupational safety and continuously improve them to create a safe working environment.

We contribute to creating a safe workplace and behave responsibly ourselves, which includes the following:

- We carry out our work in a safe, competent and professional manner.
- We comply with all legal requirements and company principles and policies relating to safety in the workplace.
- We familiarize ourselves with the safety regulations and emergency plans applicable to our workplace in order to be able to react appropriately in the event of an emergency or other incident.

# TRANSPARENT COMMUNICATION – BOTH INTERNAL AND EXTERNAL

**External communication** includes all ways in which Quirónsalud communicates with the public and other stakeholders, such as through press releases, digital platforms, advertising or **social media**. Our **internal communication**, such as events or intranet campaigns, addresses our employees. It is very important that we all communicate in a transparent and respectful way – both internally and externally. In this way, we protect Quirónsalud good reputation and contribute to its long-term success. Everything that is said or written about Quirónsalud can have a positive or negative impact on our image. Even if we are privately active on social media, it can often be recognized that we work for Quirónsalud. It is therefore important to be aware that private posts on social media can also have an impact on Quirónsalud reputation.

We communicate responsibly both internally and externally.

## LET'S DO THE RIGHT THING TOGETHER

External and internal communication is the task of trained communicators. Enquiries from journalists will only be answered by authorized company spokespersons. Questions from investors and analysts are answered by the Investor Relations team. We therefore forward these requests immediately in order to enable reliable, consistent statements and to protect confidential information.

We never communicate with external stakeholders or the public on behalf of Quirónsalud unless we are instructed and authorized to do so. When we speak publicly as private individuals about Quirónsalud or work-related matters, we protect confidential information and make it clear that we are expressing our personal views. We do not use the name or company logos for private purposes.

Quirónsalud has official accounts in social networks. The accounts are managed by editorial teams. We can interact with these accounts and share or comment on posts.

When we are active on social media or internal communication platforms, we act responsibly and consider the consequences for ourselves and for Quirónsalud before posting a message.

We do not use hateful, offensive, derogatory, harassing, discriminatory, racist and inhumane expressions, nor do we interact with them.

**We act today for a  
better tomorrow**



**WE ACT TODAY  
FOR A BETTER  
TOMORROW**

# RESPONSIBLE INTERACTION WITH THE ENVIRONMENT

A healthy planet is the basis for a healthy life. **As a healthcare company, we bear responsibility – for the well-being of people and hence also for our planet.** Because our health starts with a healthy home. We are actively committed to the efficient and responsible use of natural resources and take precautionary measures in order to avoid potentially negative environmental impact of our business activities. Where we cannot avoid them, we take action to minimize them. Standards such as ISO 14001 form the basis of our environmental management systems.

We feel responsible for reducing our ecological footprint as much as possible.

## LET'S DO THE RIGHT THING TOGETHER

In all our activities, we not only ensure compliance with applicable environmental rules and regulations, but also create a culture in which each and every one of us should feel responsible for reducing our ecological footprint as much as possible. We also encourage our employees to develop approaches to improve our environmental management performance.

We are committed to energy efficiency and climate protection and are working to develop sustainable solutions for our business, our facilities and our customers.

Water is an element of life and one of our most valuable resources, as well as a resource that ensures the high-quality standard of our products and compliance with hygiene regulations in healthcare facilities. That is why we are committed to holistic water management at our locations.

We support the transition to a circular economy. We strive to maximize the lifespan of materials, reduce waste and increase the proportion of recyclable materials in our waste streams. Proper and legally compliant waste disposal is a matter of course for us.

We have set for ourselves ambitious targets in the areas of environmental and climate protection and are developing measures and plans to counter and adapt to climate change within our power. We expect the same from our business partners. We rely on our suppliers in particular to also commit to these goals and are working with them to improve their sustainability performance.

# STRENGTHENING CONFIDENCE THROUGH DATA PROTECTION

Where innovative, data-based technologies are revolutionizing the healthcare sector, strong data protection is necessary. It is necessary to give all people who are in contact with Quirónsalud on a daily basis a secure feeling that not only their health but also their personal data are in trustworthy hands with us. **Because data protection is protection of trust.** Successful treatment begins with trust in an institution and its employees – in the medication, nutrition or medical products that we produce. However, data protection does not end with patients, but includes everyone who entrusts us with their data – employees, customers, suppliers, healthcare professionals and other business partners.

We live data protection and demonstrate a high degree of sensitivity when handling personal data.

## LET'S DO THE RIGHT THING TOGETHER

We take part in data protection trainings, integrate the knowledge we have acquired into our work processes and never lose sight of the people behind the data.

We assign responsibilities and apply internal rules, policies and SOPs to ensure the protection of people and their personal data.

We protect personal data in accordance with the applicable data protection laws and data protection principles:

- We have a documented legal basis for the collection, use and processing of personal data.
- We treat personal data fairly and transparently.
- We only use personal data for the stated, explicit and legitimate purposes for which it is collected.
- We only collect and use personal data that is necessary for the defined purpose that has been communicated to the individual.
- We keep personal data accurate and up to date.
- We do not store personal data for longer than necessary for the purposes for which it was collected, unless required by law.
- We take appropriate technical and organizational measures to protect personal data from destruction, loss, unauthorized modification, disclosure or unauthorized access.
- We only engage processors who provide sufficient guarantees for the implementation of appropriate technical and organizational measures.

# PROTECTING THE DIGITAL ENVIRONMENT THROUGH CYBER SECURITY

Cyber security refers to the protection of our digital ecosystem (including information, computer systems, networks, medical devices, production facilities and more) from cyber risks and attacks. These include threats such as unauthorized access, data loss, manipulation or sabotage. **The aim of cyber security is to continuously guarantee the confidentiality, integrity and availability of our digital ecosystem.** Cyber risks and attacks can negatively impact and restrict the production and distribution of our products. They can impair the functioning of our medical devices and jeopardize our ability to care for patients in healthcare facilities. Our constant aim is to ensure a strong line of defense against cyber risks and attacks. We also ensure that all requirements of the applicable safety-related legislation for medical devices, critical infrastructure and essential businesses are met. If necessary, we work together with the authorities.

We protect our digital ecosystem by making smart decisions.

## LET'S DO THE RIGHT THING TOGETHER

We think before we click on a link or open an attachment. Our caution is the first line of defense against potential cyber threats.

We follow our policies, which serve to protect our information and systems. Consistent compliance with the policies ensures that together we build a strong defense against cyber risks.

We use our wide range of education and training programs to keep up to date with increasing cyber risks, such as social engineering, hacking, computer malware, ransomware and phishing messages.

We are vigilant and report any anomalies. If we notice something unusual or suspect a possible security incident, we report it immediately – thereby making a significant contribution to the security of our digital ecosystem.

We protect our login data. Strong, secret and unique passwords and multi-factor authentication (MFA) are the key to preventing unauthorized access and thus protecting the entire organization.

We handle information responsibly. Every piece of information is valuable and requires careful handling. The appropriate protection of this information is a commitment to the trust of our stakeholders.



# PROTECTION OF CONFIDENTIAL COMPANY INFORMATION

Protecting confidential company information is critical to ensure that Quirónsalud sensitive data and trade secrets are protected from unauthorized access, misuse or disclosure. It is important to protect the confidentiality of business secrets as well as financial, strategic and health-related information. Unauthorized disclosure or misuse of such information could damage our competitiveness and reputation and undermine confidence in us. **Confidential information** is all data that is not contained in publicly accessible documents such as annual reports or official publications. This typically includes strategic and commercial information, business plans, sales data, supplier and customer information, pricing, inventions, new products in development, personnel data or financial information.

We never disclose confidential company information or business secrets and protect such from unauthorized access.

## LET'S DO THE RIGHT THING TOGETHER

We only share confidential information with people who need it for their work, always in accordance with the need-to-know principle.

Business secrets constitute all information that is identified as confidential, for which appropriate measures are taken under the given circumstances to maintain confidentiality and which can be assumed not to be publicly known or readily accessible and should not be published. Confidential information and business secrets may not be used to gain a personal or commercial advantage for oneself or third parties.

We respect the confidentiality obligations set out in our employment contracts and take all necessary precautions to protect confidential information from inadvertent use or disclosure. This means that we do not discuss confidential matters with unauthorized persons, such as family members.

Insider information – namely unpublished information that could influence the stock market price of Quirónsalud or the securities of a business partner – is subject to strict legal regulations. We may not use this insider information for personal gain when buying or selling securities and treat it with the greatest discretion.

# PROTECTION OF COMPANY ASSETS

The **protection of corporate assets** ensures that Quirónsalud's tangible and intangible assets are protected against loss, theft, misuse or damage. Responsible behavior also includes the sustainable use of work equipment, the protection of intellectual property and the conscientious handling of our financial resources. Responsible behavior ensures that company resources are used efficiently.

We protect our assets against loss, theft, destruction or unauthorized use.

## LET'S DO THE RIGHT THING TOGETHER

We protect our assets - such as physical, financial, technical and intellectual property - as well as know-how, against loss, theft, destruction or unauthorized use. This also means that we treat company property and the property of third parties that is made available to us with due care and utilize it in accordance with the company's objectives, business tasks and applicable regulations.

We use the company's own resources entrusted to us carefully and economically and in line with the company's objectives. We endeavor to avoid loss, waste and premature wear and tear.

It may be a criminal offence if we use company property inappropriately for private purposes, waste company funds or fail to reclaim money spent without a legal basis.

Therefore, we use company funds and other company assets responsibly and only for legitimate and justified purposes. We manage the budget conscientiously and handle the company's financial resources responsibly. We duly pursue any claims for reimbursement of unjustified payments that may have been lost.

**Your gut  
tells you  
something  
is wrong.**

**Tell us  
what's right.**



# **Speak-up**

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# **Our reporting channels**

# OUR REPORTING CHANNELS

Messages about possible misconduct, both within our company and in the supply chain, are an important aid in ensuring a corporate culture characterized by integrity. That is why we have created easily accessible reporting systems.

For us as a company, it is crucial to detect potential misconduct at an early stage in order to prevent it effectively and respond appropriately.

We offer comprehensive whistleblower protection. Our whistleblowing systems ensure that reports are submitted confidentially and anonymously. Investigations are conducted objectively by independent experts. We do not tolerate any discrimination against people who report possible misconduct in good faith or support investigations. This also means that we systematically pursue all cases of discrimination against such whistleblowers. Reports in which other persons are unfairly accused against their good judgment constitute a violation of our compliance standards.

We provide any interested person with a confidential, secure and independent communication channel, adapted to the requirements of Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, called “Whistleblower Channel”, and accessible through our corporate website [[freseniusgroup.ethicspoint.com](https://freseniusgroup.ethicspoint.com)].

The aim is to enable the Quirónsalud Group to prevent, detect, react and remedy 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. For this reason, the Group's Professionals have the duty to report possible risks and breaches of which they are aware.

# OUR REPORTING CHANNELS

We use our reporting channels if we have indications of possible misconduct in connection with our business activities.

## LET'S DO THE RIGHT THING TOGETHER

The following confidential and secure reporting channels are available to us:

### **Quirónsalud Group:**

Web entry: [canaldedenuncias-quironsalud.ethicspoint.com](mailto:canaldedenuncias-quironsalud.ethicspoint.com)

Email: [canaldedenuncias@quironsalud.es](mailto:canaldedenuncias@quironsalud.es)

### **Fresenius Group:**

Web entry: [freseniusgroup.ethicspoint.com](mailto:freseniusgroup.ethicspoint.com)

Mobile entry: [freseniusgroup.navexone.eu/](mailto:freseniusgroup.navexone.eu/)

Email: [integrityline@fresenius.com](mailto:integrityline@fresenius.com)

### **Fresenius Kabi:**

Web entry: [complianceactionline.ethicspoint.com](mailto:complianceactionline.ethicspoint.com)

Email: [compliance@fresenius-kabi.com](mailto:compliance@fresenius-kabi.com)

### **Helios:**

Communication channels:

[helios-gesundheit.de/compliance/kontakt/](https://helios-gesundheit.de/compliance/kontakt/)

**Let's do the right  
thing together**

# Imprint

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