SUPPLIER ETHICAL CODE





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INTRODUCTION

Purpose

At HTBA (referring to HEALTHTECH BIO ACTIVES, S.L.U. and all other companies within its

corporate group) we believe that our mission goes beyond professionally and rigorously

addressing the needs of our clients. It is important for our team to take an active role in

managing today's social and environmental challenges.

For this reason, we wish to share with our partners the values and principles that guide

our conduct and influence our actions and decisions.

This Supplier Ethical Code is aligned with the HTBA Ethical Code and ESG Policy (available at

www.htba.com), and is grounded in the principles that support our company's mission,

vision, and values. It is also aligned with key international frameworks, including the Universal

Declaration of Human Rights and the Sustainable Development Goals (SDGs), both from the

United Nations, as well as the Declaration on Fundamental Principles and Rights at Work

from the International Labour Organization.

Scope

This guide is addressed to all suppliers with whom we have a direct relationship, with the

objective of ensuring they understand and integrate the principles set out in this

document into their policies and management systems.

Suppliers are expected to implement measures that ensure the sustainable fulfilment of

these commitments and to encourage their collaborators to adopt these values as well.

HealthTech Bio Actives, S.L.U. Avinguda Diagonal, 567, Planta 4 08029 Barcelona, Spain

COMMITMENT TO THE ENVIRONMENT

Suppliers are expected to take steps to identify and mitigate the environmental impacts of

their activities, focusing efforts on:

Emissions. Implement procedures to measure and reduce greenhouse gas emissions,

progressively minimizing the carbon footprint.

Resource use. Develop practices that promote the responsible use of resources (water,

energy, land, etc.) and enable the tracking and monitoring of consumption. Promote the

transition to renewable energy sources.

Biodiversity. Ensure that all activities respect biodiversity and ecosystems, avoiding

degradation and overexploitation and committing to their preservation.

Waste management. Adopt practices to reduce waste generation, promoting reuse,

recycling and other circular resource strategies. Ensure proper management of all waste,

particularly hazardous waste.

COMMITMENT TO PEOPLE AND HUMAN RIGHTS

Suppliers are expected to take actions that ensure a safe and respectful working environment

for all workers.

Human rights. Ensure that all activities and business relationships respect the rights

established in the Universal Declaration of Human Rights from the United Nations.

Child and forced labour. Ensure that no child labour, forced labour, prison labour or any

form of servitude, slavery or human trafficking is used.

Non-discrimination and equal opportunity. Develop initiatives to prevent

discrimination based on gender, age, sexual orientation, ethnicity, religion, disability or any

other status. Implement measures to create an inclusive work environment with equal

opportunities.

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Working conditions. Respect the fundamental labour rights established by the

International Labour Organization. Ensure that labour practices provide a decent quality of

life (e.g., wages, working hours, vacation). Support freedom of association and the effective

recognition of collective bargaining rights.

Health and safety. Establish a safe work environment to prevent and reduce workplace

accidents and occupational illnesses. Provide relevant training and establish procedures to

monitor and continuously improve health and safety practices.

Wellbeing of people. Contribute to employee satisfaction and wellbeing by implementing

initiatives that address workload management, work-life balance and professional

development through skills and competence enhancement.

Local impact. Ensure that operations do not negatively impact local communities and their

environments, protecting their livelihoods, culture, biodiversity and natural resources.

COMMITMENT TO ETHICAL AND RESPONSIBLE GOVERNANCE

Suppliers are expected to develop practices that embed ethical and responsible principles

across all aspects of their business management.

Legal compliance. Comply with all applicable local, national and international laws and

regulations. Respect all treaties and international standards relevant to their business

activities.

Anti-corruption and bribery. Refrain from all forms of corruption (including money

laundering, bribery, and extortion). Comply with local anti-corruption laws in all countries of

operation. Adhere to the standards of ethical conduct outlined in HTBA's Anti-Corruption and

Anti-Bribery Policy, available at www.htba.com/sustainability. Avoid conflicts of interest and

comply with competition law. Do not offer, promise, grant, request, receive, or accept—

directly or indirectly—any gifts, favours, benefits, or compensation, in cash or kind, to or from

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any individual connected to HTBA. Understand and consider local customs to always uphold

the best interests and reputation of HTBA.

Responsible value chain management. Maintain fair relationships with suppliers and

implement oversight to ensure compliance with relevant legal frameworks. Promote respect

for human rights and environmental standards throughout the value chain and monitor

adherence to these principles.

Information security. Ensure the protection, integrity and confidentiality of information,

including compliance with applicable data protection regulations.

Communication and transparency. Foster responsible, truthful and transparent

communication practices and engage in open dialogue with external stakeholders.

Intellectual and industrial property. Respect HTBA's and third parties' intellectual and

industrial property rights in accordance with applicable laws and agreements.

Product and/or service quality. Suppliers must implement rigorous controls to ensure

that products and services delivered to HTBA meet our quality and safety requirements, as

well as comply with applicable laws and regulations.

Financial health. Suppliers must maintain a sound and sustainable financial position that

enables them to meet their contractual obligations effectively and continuously. They are

expected to manage their resources responsibly to ensure operational stability and avoid

supply chain disruptions.

CONTACT

We expect suppliers to communicate these commitments to their own employees and to

their business partners across the value chain.

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In the event of misconduct that breaches the principles of this Code—whether by someone in the supplier's organization, a value chain partner, or a representative or employee of HTBA—we encourage suppliers to contact us.

HTBA provides an accessible **communications channel** for internal and external parties to report any potential violations of applicable laws, this Code, or any other HTBA policy. Reports can be made anonymously or by name, at the discretion of the reporter. Confidentiality is always assured. This **channel** is available via HTBA's website at www.htba.com.

To report concerns specifically related to this Supplier Ethical Code, you may also contact our Ethics Committee at: compliance@htba.com.

Thank you for your cooperation.

DOCUMENT HISTORY

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