



ALLOGA LOGIFARMA S.A.

**Code of Business
Conduct and
Ethics**

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

INDEX

1.	BACKGROUND.....	5
2.	GENERAL INFORMATION	5
3.	ABOUT THE BUSINESS ACTIVITY OF ALLOGA LOGIFARMA	8
4.	OUR RELATIONSHIPS.....	15
5.	GUARANTEE OF COMPLIANCE.....	16
6.	APPROVAL AND REVIEW.....	25
7.	LEGAL NOTICE	25
8.	TEMPLATES AND ARCHIVE	26
9.	VERSION HISTORY	26
10.	APPROVAL OF THE MANUAL	26

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

MESSAGE OF THE CHAIRPERSON OF THE EXECUTIVE COMMITTEE


Alloga Logifarma is committed to ensuring the adoption of good management principles and conducting all company business in accordance to the highest levels of business ethics, honesty and integrity. This code reaffirms the commitment of the Board of Directors to ensuring ethics and integrity.

As part of the Organisation's most important assets, the principles of transparency, integrity and honesty guide our relationships with our Clients, Employees, Suppliers, Business Partners, Regulatory Entities and the Communities that we serve. Our Clients, Suppliers and other Stakeholders expect nothing less than fair, honest treatment. It is the responsibility of each and every one of us – the Executive Committee, Senior Management and our team members – to be aware of the importance of conducting our business and all of our transactions in accordance to the highest, most stringent standards of integrity, service and partnership, which underpin all aspects of our business activity.

The Code of Business Conduct and Ethics is an integral part of the good management principles adopted by the Organisation, which require compliance with high, consistent business standards. The Code specifies the auxiliary principles that should be observed in order to ensure our ability to make the right decisions when faced with ethical issues. The Organisation's commitment to conducting business in accordance with the principles of ethics, integrity and honesty begins and ends with each and every one of us. This Code will be reassessed, reviewed and updated by the ANF Group Compliance Department and the Alloga Logifarma Technical and Quality Department whenever required, taking into account any new policies, laws, regulations, developments and best practices, such as to ensure their integration into our activities and business structure.


The effective application of this Code, which we all should understand, believe in and follow rigorously, represents one of our highest priorities. Compliance with this Code is mandatory and applies to all Employees of Alloga Logifarma, with no exceptions. The Organisation follows a zero tolerance policy with respect to ethical violations. Any conduct that fails to meet these standards can lead to disciplinary action or even dismissal.

Although detailed information is provided in this Code, we strongly encourage our Employees to express their opinion and seek adequate guidance in case of doubt regarding the right conduct, in any given situation. We ask any Employee who may detect any non-compliance with this Code to report the issue through the means identified in this document, in order to ensure the confidentiality of the process.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

Only by acting as a team, guided by a shared Vision and Values, will we be able to continue developing and growing as a Company and achieve greater success. In this sense, we must all undertake personal responsibility for the manner in which we conduct business at our Organisation. We urge all Employees to join us in fully embracing the contents and the spirit of this Code, as we continue working together to build an even bigger Company, of which we can be increasingly proud.

THE CHAIRPERSON OF THE EXECUTIVE COMMITTEE

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

1. BACKGROUND

This Code establishes the guiding principles and standards of conduct and ethics that must be observed and consistently adopted and followed by all Alloga Logifarma Employees, irrespective of their contractual relationship with the Company.

Alloga Logifarma conducts its business in accordance with the highest standards of integrity and respect for its Shareholders, Clients, Suppliers, Business Partners, Stakeholders and the Portuguese society at large, based on its Mission, Values and Vision.

The main purpose of the principles and guidelines herein established is to provide guidance to our Employees with respect to their daily activities and ensure the adoption of the best professional conduct, at all times, in accordance with the required standards of ethical conduct.

The ANF Group Compliance Department and the Technical and Quality Department of Alloga Logifarma are responsible for updating this document and ensuring its circulation.

2. GENERAL INFORMATION

2.1. WHAT IS IT?


This Code of Conduct and Ethics compiles and describes the standards of ethical and professional conduct and the principles that must be observed by all Employees.

The standards of conduct listed in this document are based on the Mission, Values and Vision of Alloga Logifarma.

The systemised description provided includes general information, followed by a series of rules applicable to the Company's business and its Employees, as well as guidelines concerning relationships between stakeholders and, finally, the procedures adopted in order to ensure and monitor compliance with the Code.

2.2. TO WHOM DOES IT APPLY?

All governing bodies and Employees are expected to comply with the ethical principles and standards set out in this Code, irrespective of their role within the Organisation, at any location and with respect to any person or entity with which they engage on behalf of the Company.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

The duty of compliance with the Code and the respective guidelines also applies, with the necessary adaptations, to legal and other representatives, as well as service providers holding the necessary powers to act in the name and on behalf of Alloga Logifarma (e.g. on business trips or in meetings, conferences, training sessions, etc.).

The establishment of specific regulations, procedures or guidelines, with respect to ethical issues, by the various organisational units of Alloga Logifarma, may be justified in view of legal or regulatory requirements, or specific circumstances. In these cases, the principles established in this Code will be observed.

2.3. WHY WAS IT CREATED?

This Code was created for the following basic purposes:


- (i) Establishing the principles that guide the business of Alloga Logifarma;
- (ii) Specifying the rules of ethical and professional conduct that must be followed by all Employees;
- (iii) Encouraging the adoption of the aforementioned principles and rules in all relationships, within and outside Alloga Logifarma;
- (iv) Consolidating the institutional image of Alloga Logifarma;
- (v) Ensuring compliance with the obligations arising from the General Regime for the Prevention of Corruption, as set out in Decree-Law 109-E/2021, of 09 December.

2.4. WHO CAN I CONSULT IN CASE OF DOUBT OR CONFLICT OF INTEREST?

Although this Code includes very detailed information, it is impossible to foresee each and every situation or circumstances. In case of doubt, the Employees are encouraged to express their point of view and consult the Regulatory Compliance Officer and/or the Ethics Ombudsman for advice, as applicable, in matters related to conflicts of interest, prevention of corruption or compliance with ethical principles, values and rules of professional conduct.

The Regulatory Compliance Officer and the Ethics Ombudsman are responsible for taking all the necessary steps to investigate all situations reported, or brought to their knowledge through unofficial channels, and issuing their opinion or recommendations on the matters in question.

The Regulatory Compliance Officer and the Ethics Ombudsman can also provide the necessary clarifications should any doubts arise in connection with this Code.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

Reports can be submitted to the Regulatory Compliance Officer through the following email address:


- responsavel.cumprimento.normativo@anf.pt

Reports can be submitted to the Ethics Ombudsman through the following email address:

- provedor.etica@anf.pt

2.5. DEFINITIONS

Term	Definition
Clients	Natural or legal persons with whom Alloga Logifarma has signed binding contracts.
Compliance	Compliance with all laws, regulations, rules, guidelines, policies, procedures and ethical standards, in all countries where Alloga Logifarma operates.
Employees	All members of governing and corporate bodies, managers and Employees of Alloga Logifarma, bound by any type of contact, including temporary workers, consultants, representatives or any other persons that provide permanent or occasional services to the Company.
Group that includes Alloga Logifarma	All entities in a corporate relationship with Alloga Logifarma.
Confidential information	Confidential information includes, but is not limited to, personal information of Employees and third parties; know-how; and R&D, corporate, technical, regulatory, legal, financial or contractual information, as well as any other information classified as confidential.
Stakeholders	Persons, entities or groups that may affect, or be affected by, the Company's activities, products or services, including Employees, partners, associates, shareholders, clients, suppliers, counterparties, business partners, regulatory entities and communities.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

Suppliers	Any person or entity providing goods or services to Alloga Logifarma.
All	This term includes associates, partners, shareholders, members of governing bodies, members of executive committees, managers, Employees, clients, counterparties, suppliers and business partners.

3. ABOUT THE BUSINESS ACTIVITY OF ALLOGA LOGIFARMA

3.1. MISSION, VISION AND VALUES

Our Mission

Creating Value-Added solutions in the logistics area, fostering Employee motivation and offering value to shareholders.

Our Vision

To be a preferred partner in the Pharmaceutical Industry and the Health and Wellness area, by focusing on service quality and innovative solutions.


Our Values

The values of Alloga Logifarma reflect the principles that govern our business activity, allowing us to become the best partner for our Clients. Our values are: Partnership, Flexibility, Trust, Initiative, Service and People at the centre of our Success.

3.2. FUNDAMENTAL PRINCIPLES

Alloga Logifarma adopts the following fundamental principles with respect to business management and professional ethics:

- ✓ Commitment and responsibility to its partners, shareholders, clients, Employees, business partners and the community;
- ✓ Honesty, integrity and mutual respect;
- ✓ Trust, initiative, availability and service excellence;
- ✓ Transparency, trust in relationships and responsibility for the consequences of its decisions and actions;
- ✓ Increasing awareness of individual ethical behaviours and ensuring compliance therewith;

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

- ✓ Minimising the risk of ethical malpractice;
- ✓ Creating sustainable value in the long term;
- ✓ Improving the quality of life of people;
- ✓ Ensuring a low environmental impact;
- ✓ Ensuring the adequate, efficient management of assets and resources;
- ✓ Monitoring and recording all business activities;
- ✓ Fostering teamwork and professionalism;
- ✓ Leading by example.


3.3. OUR LEADERS

The members of our management team are expected to lead by example and act as role models. Our leaders are responsible for:

- ✓ Ensuring that all Employees under their supervision understand their responsibilities with respect to this Code, company policies and the applicable legislation;
- ✓ Discussing the Code with the Employees and stressing the importance of adopting an ethical conduct, in accordance with this Code, company policies and the applicable legislation;
- ✓ Ensuring that the respective team members know that they can consult them for advice in case of any doubts or concerns, without fear of retaliation, and that their leaders will listen to them and respond adequately;
- ✓ Never ignoring any misconduct or retaliation against any Employee;
- ✓ Refraining from taking adverse action against any Employee for reporting any issues, in good faith, to people outside their hierarchy or through the means available for this purpose;
- ✓ Refraining from encouraging or instructing Employees to achieve business results by compromising full compliance with ethical principles, company policies or the applicable legislation;
- ✓ Taking action to prevent any infringement of this Code, internal policies or the applicable legislation by the Employees under their supervision;
- ✓ Providing advice and guidance on this Code and promoting the respective requirements.

3.4. OUR EMPLOYEES

Employee management at Alloga Logifarma is governed by the Collective Bargaining Agreement entered into with GROQUIFAR - Associação de Grossistas de Produtos Químicos e Farmacêuticos (Association of Chemical and Pharmaceutical Product Wholesale Distributors).

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

3.5. OUR PRINCIPLES

Alloga Logifarma and its Employees undertake the following obligations:

Complying with the legislation and regulations in effect:

- ✓ Acting in accordance with the legislation and regulations in effect, namely with regard to regulatory practices.
- ✓ Cooperating immediately with all competent authorities, whenever required and to the extent deemed necessary.
- ✓ Ensuring the accuracy and integrity of all internal documents.

Market:

- ✓ Following market rules and criteria.

Conflicts of interest:

- ✓ Ensuring impartiality in all actions and decision-making processes pertaining to potential conflicts of interest involving Alloga Logifarma or its Employees.

Confidentiality and privacy:


- ✓ Protecting all confidential information, in accordance with the applicable legislation and regulations.
- ✓ Ensuring the right of all Employees to keep their personal lives private, in a scrupulous manner.
- ✓ Ensuring confidentiality in the collection, processing, storage and transfer of the personal data of Employees, Suppliers, Clients or other Stakeholders, and ensuring that access to this information is legitimate, by requesting authorisation for this purpose, whenever applicable.

Control and monitoring:

- ✓ Approving and implementing adequate internal control measures for the prevention and detection of fraud or irregularities (namely regarding financial matters, corruption and related offences, conflicts of interest and use of information and assets).

Corruption and related offenses:

- ✓ Prohibiting and sanctioning any practice that may be construed as corruption, active or passive, including facilitation payments or the offer, maintaining or promise of privileged treatment or favours.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

- ✓ Refusal to accept or offer any invitations or gifts in circumstances that might compromise the principles and values of Alloga Logifarma.

Donations and charitable activities:

- ✓ Offering donations to charities and non-commercial sponsorships, provided that such donations do not serve the purpose of obtaining unethical business or illicit advantages, and do not represent a conflict of interest.
- ✓ Complying with the procedures defined for the authorisation, recording and advertising of donations and charitable activities.

Financial matters:

- ✓ Complying with procedures defined for the prevention and detection of illegal financial and accounting practices, including money laundering.
- ✓ Ensuring the reliability and accuracy of the accounting records of Alloga Logifarma.

Environmental practices:


- ✓ Acting in defence of the Environment and ensuring compliance with good environmental practice, including the efficient, rational use of resources.
- ✓ Supporting sustainable development in economic growth, with the future generations in mind.

Marketing practices:

- ✓ Representing themselves and Alloga Logifarma with integrity and protecting the Company's reputation as an ethical, trustworthy organisation.
- ✓ Ensuring that all statements about Alloga Logifarma's products, services and prices are truthful, accurate and not misleading.
- ✓ Promoting the benefits offered by the products and services of Alloga Logifarma, and refraining from making disparaging or false statements about the Company's competitors.
- ✓ Refraining from using misleading advertising, or unfair to competitors, based on claims not backed up by scientific evidence.

Relationships between the Employees:

- ✓ Respecting and encouraging an adequate work-life balance.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023


- ✓ Not tolerating moral or sexual harassment, or any physical or verbal abuse aimed at disturbing, embarrassing or offending the dignity of others, which are likely to contribute to creating a hostile, offensive, intimidating, degrading, humiliating or destabilising working environment.
- ✓ Acting with courtesy, dignity and respect, irrespective of ethnicity, gender, age, physical condition, marital status, sexual orientation or religious beliefs.
- ✓ Ensuring confidentiality with respect to the private lives of Employees.
- ✓ Adopting a cordial, respectful behaviour, based on cooperation and clear, truthful communication.

Relationships with competitors:

- ✓ Ensuring full compliance with all competition laws and regulations applicable to the Company's operations, and refraining from exploiting dominant positions in the markets where this may occur.
- ✓ Refraining from encouraging clients or competitors to breach contracts with third parties.
- ✓ Refraining from engaging in illegitimate access to confidential information or benefitting from unfair competitive advantages.
- ✓ Refraining from sharing sensitive information with competitors.
- ✓ Avoiding anti-competitive behaviours, such as collusion with competitors, namely regarding prices, tenders, allocation of products or territories, selection of Clients or Suppliers, distribution restrictions and resale price maintenance.
- ✓ Refraining from making false, misleading or derogatory statements about the Company's competitors.
- ✓ Refraining from engaging in other unacceptable activities or practices likely to damage the Company's reputation.
- ✓ Complying with the competition and anti-trust laws applicable in the countries where Alloga Logifarma and other Group companies conduct their business.

Relationships with public and government officials:

- ✓ Knowing and complying with the regulations applicable to trade relationships, negotiations and the terms of contracts signed with public and government entities and the respective Employees.
- ✓ Knowing and complying with the requirements applicable to business with state entities, national and international.
- ✓ Avoiding behaviours that could be construed as attempts to influence civil servants in the performance of their official duties.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023


- ✓ Refraining from offering or receiving gifts, or offering meals, drinks, travel or accommodation to civil servants.
- ✓ Prohibiting any contributions to political parties.
- ✓ Should any of our Employees engage in any political activity, it should be clearly understood that such actions are conducted strictly in their own name and never on behalf of Alloga Logifarma. In this sense, the Employees concerned are not allowed to use Company time, property, equipment or funds to promote or participate in political activities.

Equal treatment and opportunities (non-discrimination):

- ✓ Ensuring respect for human dignity and diversity.
- ✓ Complying with all applicable legislation and regulations pertaining to the observance of human rights, fair labour practices and prohibition of slavery, forced labour, child labour, human trafficking and sexual exploitation.
- ✓ Refraining from condoning or abetting any discriminatory behaviours, particular with respect to job interviews, recruitment processes, access to training, career progression, performance assessments and employment termination.
- ✓ Treating Employees fairly and ensuring equal opportunities, such as to foster professional and personal development and encourage engagement and participation in training programmes.
- ✓ Treating Employees in a fair, equitable manner, and refraining from exploiting close family relationships to influence Employees.
- ✓ Performing assessments in a fair, clear, rigorous manner, by adopting methods that should be previously disclosed to the persons to whom they will apply.

Occupational Health, Safety and Environment

- ✓ Complying with health and safety rules.
- ✓ Creating a good working environment.
- ✓ Sharing information and fostering team spirit through shared goals and mutual help.
- ✓ Adopting environmentally friendly practices, namely waste segregation, efficient management of goods and resources, and the preferential use of biodegradable or recyclable materials.
- ✓ Promoting and advocating environmentally friendly behaviours before partners, Clients and the community.
- ✓ Refraining from possessing, distributing, using or trading any illegal or prohibited substance at the premises of Alloga Logifarma.
- ✓ Refraining from performing professional duties under the influence of drugs or alcohol.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

Communication and social networks:

- ✓ Complying with the internal procedures applicable to official publications on Alloga Logifarma's social networks and communication with the media.
- ✓ Observing the duties of loyalty, confidentiality, civility and respect for Alloga Logifarma and the other Employees, and refraining from publishing any contents of their own authorship, or making any statements to the media, that may harm the image and good name of Alloga Logifarma or of the respective Employees.


Email, voicemail and Internet:

- ✓ Respecting copyright and ensuring strict compliance with the laws and policies concerning software use and copying.
- ✓ Using the equipment and systems of Alloga Logifarma only for professional purposes, as related to their duties, and minimising personal use, which should under no circumstances hinder the diligent, punctual fulfilment of professional tasks and obligations, or disturb other Employees.
- ✓ Declaring all personal emails as such.
- ✓ Refraining from sharing any abusive, violent, discriminatory or illegal contents.
- ✓ Refraining from using the Company's systems and equipment to send, intentionally receive, retrieve or store abusive, aggressive, sexual, discriminatory, offensive, illicit or unethical information, or act in any manner that might involve the risk of attack by a virus or any other cyberattack likely to cause damages or entail liabilities to Alloga Logifarma.

Misuse of company property:

- ✓ Protecting the assets, tangible or intangible, entrusted to them, including IT systems and intellectual and industrial property, even if produced by themselves, and ensuring their use only in connection with business processes, in an efficient manner.
- ✓ Refraining from sharing software any other contents that may cause damages to the property of Alloga Logifarma or of any third parties.
- ✓ Assigning all intellectual property to Alloga Logifarma, for internal use and benefit of the Company, and assisting the latter, at all times, including after termination of employment, with the procedures required to obtain patents, copyrights or any other instruments used to protect intellectual property.

Use and destruction of information:

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

- ✓ Observing the duty of secrecy with respect to all information and facts likely to have a relevant impact on the Company's business activity, of which they gain knowledge in connection with their professional duties at Alloga Logifarma.
- ✓ Using the information to which they have access exclusively for the intended purposes and acting in the interest of Alloga Logifarma and of any other legitimate owners.
- ✓ Refraining from destroying any records of Alloga Logifarma without prior authorisation.
- ✓ In general terms, ensuring strict compliance with the internal policies in effect regarding the use of information.
- ✓ Refraining from disclosing non-public information to third parties or performing or recommending the transaction of securities to any person, based on material non-public information.

4. OUR RELATIONSHIPS


We undertake the following commitments to:

4.1. THE COMMUNITY

- ✓ Improving the quality of life of the communities we serve.
- ✓ Supporting the communities by sharing know-how and technical expertise, and offering our time, resources, healthcare products and medicinal products, if authorised.
- ✓ Promoting and participating in initiatives aimed at raising social awareness.
- ✓ Building and maintaining close, direct, open relationships, for the purpose of gaining insight into the needs of the communities, ensuring respect for their cultural identity and contributing to improving the living conditions of the populations.
- ✓ Focusing on energy efficiency and helping to implement sustainable lifestyles.
- ✓ Where applicable, providing information to the citizens about the risks and dangers associated with the administration and misuse of medicinal products.
- ✓ Adopting precautionary measures in situations where the Company's activities may involve any risk of serious, irreversible damages to life, human health or the Environment.
- ✓ Ensuring that any information circulated through the media is informative, truthful and respects human dignity and the cultural and ethical values of the communities.

4.2. OUR SHAREHOLDERS

- ✓ Seeking to create value for our shareholders.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

- ✓ Acting in the interest of our shareholders.
- ✓ Providing all necessary information to all of our shareholders, in a clear, truthful, intelligible manner, such as to enable them to make free, informed decisions.
- ✓ Adopting corporate governance practices, legal and regulatory.

4.3. OUR CLIENTS

- ✓ Ensuring professionalism, respect and loyalty in our relationships with our Clients.
- ✓ Ensuring quality in the distribution of goods and provision of services.
- ✓ Providing all necessary information, in a truthful, clear, timely manner, such as to enable our Clients to make free, informed decisions.
- ✓ Ensuring strict compliance with contract terms and conditions.
- ✓ When applicable, knowing and complying with international trade laws and regulations, and verifying the eligibility of recipients to purchase the products marketed.


4.4. OUR SUPPLIERS

- ✓ Selecting Suppliers based on clear, transparent, impartial criteria.
- ✓ Treating all Suppliers respectfully.
- ✓ Fulfilling all commitments timely.
- ✓ Selecting suppliers that adopt, or commit to adopting, stringent standards with respect to working conditions, occupational health and safety, Employee wellness and environmental management.
- ✓ Ensuring compliance with the ethical and conduct standards described in this Code.
- ✓ Ensuring that all contracts are reviewed by our Legal team before their signature, in order to guarantee their legitimacy and ensure compliance with the principles of this Code.

5. GUARANTEE OF COMPLIANCE

5.1. CIRCULATION

This Code, as well as any subsequent changes, revisions or updates, will be provided to all Employees, in printed and/or digital format, and published on the website and the shared network of Alloga Logifarma.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

The Employees will be required to sign a declaration confirming that they have received, read and understood this Code, and that they undertake the obligation to comply therewith and enforce the respective provisions.

5.2. WHISTLEBLOWING AND CONFIDENTIALITY

The Employees will be required to report any possible infringements of this Code, as well as suspected offences, as detected in connection with information obtained within the scope of their professional duties at Alloga Logifarma.

Reports should be submitted through the whistleblowing channel, available on: <https://alliancehealthcare.whistlelink.com>. Protection against retaliation will be guaranteed; all proceedings will be conducted confidentially.

Offences concerning other ANF Group companies can be reported through the following channels:

- <https://anf.whistlelink.com>
- <https://glintt.whistlelink.com>

The ANF Group Whistleblowing Policy, available on the aforementioned channels, should be consulted for this purpose.


5.3. INFRINGEMENT

Each and every Employee is responsible for knowing and complying with the rules set out in this Code.

Any infringement of the rules established in this Code may entail serious, adverse consequences to Alloga Logifarma and the Group of which it is a part, including reputational damages. Such infringements will be penalised through the application of any and all corrective actions deemed adequate, as well as disciplinary action, as applicable to the offence in question, under the terms of the legislation in effect. In this sense, infringements should be immediately reported by the Employees who gain knowledge thereof.

5.3.1. DISCIPLINARY SANCTIONS APPLICABLE IN CASE OF INFRINGEMENT OF THE CODE OF CONDUCT

Any Employees who infringe this Code of Conduct, or the Policies of Alloga Logifarma and the Group of which it is a part, may incur the following sanctions:

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

- ✓ Criminal liability, under general terms, if the infringement corresponds to a crime for which sanctions have been set out in the applicable legislation;
- ✓ Civil liability, under general terms, as legally applicable;
- ✓ Disciplinary action, including fair dismissal, if the respective conditions are met.

Should Alloga Logifarma gain knowledge of any behaviour that may constitute an infringement of the rules set out in this Code, adequate disciplinary proceedings will be initiated, for the purpose of applying any of the sanctions provided for in the legislation in effect, or to conduct a prior investigation, if required.

All Employees subject to disciplinary action have the legal right to be heard.

In accordance with the current legislation, Alloga Logifarma may apply the following sanctions within the scope of its disciplinary powers:

- ✓ Verbal warning;
- ✓ Written warning;
- ✓ Financial penalty;
- ✓ Loss of holidays;
- ✓ Suspension from work with loss of pay and seniority;
- ✓ Termination for just cause (dismissal without the right to indemnity or compensation).


The disciplinary sanction may be aggravated by its disclosure within the Company.

While respecting the rights and principles in effect, Alloga Logifarma reserves the right to carry out any investigation deemed necessary or convenient for the purpose of ascertaining the facts in question. The information collected during the investigation will be processed and archived in accordance with the applicable personal data protection regulations.

All Suppliers and service providers to which the Code applies shall be subject to the measures or sanctions established in the respective agreements or any others resulting from any decision made by Alloga Logifarma.

5.3.2. CRIMINAL SANCTIONS APPLICABLE TO CORRUPTION AND RELATED OFFENSES

ACTIVE CORRUPTION – article 374 of the Penal Code

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, offers or promises any material or non-material advantage to an official, or to a third party, upon indication or with the knowledge of the former, for the purpose of inducing them to infringe or refrain from acting in accordance with their official duties, and even before the acceptance of the offer or promise in question, shall be punished with one to five years of imprisonment. Attempts are also punishable, in which case the term of imprisonment will be reduced by one third, at the most, and one fifth, at the least.
- ✓ If the act or omission in question is not contrary to the aforementioned official duties, but the advantage is undue, the offence will be punishable with up to three years of imprisonment or the payment of a fine of up to 360 days. Attempts are also punishable, in which case the term of imprisonment will be reduced by one third, at the most, with the minimum legal limit being reduced to one month, and the applicable fine will be reduced by one third, at the most, with the minimum limit being reduced to 10 days (each day corresponds to an amount of €5 to €500).


A manager or employee of a legal person pays a given amount to an employee of a public entity in order to secure the award of a contract, or obtain a licence, where such acts represent an infringement of the applicable public tendering or legal regulations.

A manager or employee of a legal person promises to pay a given amount to an employee of a public entity in order to speed up the assessment of a given proposal.

OFFER OF AN UNDUE ADVANTAGE – article 372, point 2, of the Penal Code

- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, offers or promises any material or non-material advantage to an official, or to a third party, upon indication or with the knowledge of the former, which is undue within the scope or in the exercise of their functions, shall be punished with up to three years of imprisonment or the payment of a fine of up to 360 days.
- ✓ No penalties shall apply to conducts deemed socially adequate and in accordance with custom.

A manager or employee of a legal person offers a gift of high value during the Christmas period to an official fulfilling relevant duties related to the supervision of the Company's business activity.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

TRADING IN INFLUENCE – article 335 of the Penal Code

- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, requests or accepts any material or non-material advantage, or the promise thereof, as compensation for trading in influence, actual or assumed, with any public entity, shall be punished with:
 - One to five years of imprisonment, if a more severe penalty is not applicable in connection with any other legal provision, if the purpose the obtaining of any favourable unlawful decision;
 - Up to three years of imprisonment or the payment of a fine, if a more severe penalty is not applicable in connection with any other legal provision, if the purpose is the obtaining any favourable lawful decision.
- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, offers or promises any material or non-material advantage to any of the persons referred to in the previous paragraph, for the purposes described in paragraph a), will be punished with up to three years of imprisonment or the payment of a fine.

A manager or employee of a legal person pays a given amount to a friend of an official in order to induce the former to persuade the latter to approve a project submitted to a public entity.


ACTIVE CORRUPTION TO THE HARM OF INTERNATIONAL TRADE – article 7 of Law no. 20/2008, of 21 April

- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, offers or promises any undue material or non-material advantage to an official, whether national, foreign or of an international organisation, a political office holder, or a third party, with the knowledge of the former, for the purpose of obtaining or retaining business, a contract or any other undue advantage in international trade, shall be punished with one to eight years of imprisonment.

A manager or employee of a legal person pays a given amount, through the signature of a consultancy contract with a third party, to a foreign government official as compensation for the awarding of a contract in the respective territory.

PASSIVE CORRUPTION IN THE PRIVATE SECTOR – article 8 of Law no. 20/2008, of 21 April

- ✓ Any private sector employee who, directly or through an intermediary, acting with their consent or authorisation, requests or accepts any undue material or non-material advantage, or the promise thereof, as compensation for infringing or

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

refraining from acting in accordance with their professional duties, shall be punished with up to five years of imprisonment or the payment of a fine of up to 600 days.

- ✓ If the act or omission in question is likely to cause a distortion of competition, or material damages to third parties, the offence will be punishable with one to eight years of imprisonment.

A manager of a private sector company accepts a given amount as compensation for awarding a contract to a supplier, in infringement of market consultation regulations and to the detriment of their company and its competitors.


An employee discloses commercial information protected by the duty of confidentiality or secrecy to a representative of a competitor, in exchange for a promise of payment.

ACTIVE CORRUPTION IN THE PRIVATE SECTOR – article 9 of Law no. 20/2008, of 21 April

- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, offers or promises any undue material or non-material advantage to a private sector employee, or to a third party, with the knowledge of the former, for the purpose of inducing them to infringe or refrain from acting in accordance with their professional duties, shall be punished with up to three years of imprisonment or the payment of a fine. Attempts are also punishable, in which case the term of imprisonment will be reduced by one third, at the most, with the minimum legal limit being reduced to one month, and the applicable fine will be reduced by one third, at the most, with the minimum limit being reduced to 10 days (each day corresponds to an amount of €5 to €500).
- ✓ If the conduct in question has the aim or is likely to cause a distortion of competition, or material damages to third parties, the offence will be punishable with up to five years of imprisonment or the payment of a fine of up to 600 days. Attempts are also punishable, in which case the term of imprisonment will be reduced by one third, at the most, and one fifth, at the least.

A manager or employee of a legal person offers a given amount to a manager of a client company as compensation for the awarding of a contract, in infringement of market consultation regulations and to the detriment of the respective company and its competitors.

A manager or employee of a legal person operating in the private sector promises to pay a given amount to an employee of a competitor as

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

compensation for disclosing commercial information protected by the duty of confidentiality or secrecy, for the purpose of obtaining a competitive advantage.

OFFER OF AN UNDUE ADVANTAGE – article 16 of Law no. 34/87, of 16 July (Crimes committed by political office holders)

- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, offers or promises any material or non-material advantage to a political office holder or senior public official, or to a third party, upon indication or with the knowledge of the former, which is undue within the scope or in the exercise of their functions, shall be punished with up to five years of imprisonment or the payment of a fine of up to 600 days.
- ✓ The provisions specified in the previous points shall not apply to conducts deemed socially adequate and in accordance with custom.

A manager or employee of a legal person offers a gift in the value of €5,000 to a minister to whom no payment is due.


ACTIVE CORRUPTION - article 18 of Law no. 34/87, of 16 July (Crimes committed by political office holders)

- ✓ Any person who, directly or through an intermediary, acting with their consent or authorisation, offers or promises any material or non-material advantage to a political office holder or senior public official, or to a third party, upon indication or with the knowledge of the former, for the purpose of inducing them to infringe or refrain from acting in accordance with their official duties, and even before the acceptance of the offer or promise in question, shall be punished with two to five years of imprisonment.
- ✓ If the act or omission in question is not contrary to the aforementioned official duties, but the advantage is undue, the offence will be punishable with up to five years of imprisonment.

A manager or employee of a legal person pays a given amount to a minister as compensation for the awarding of a contract.

MONEY LAUNDERING - article 368-A of the Penal Code

- ✓ For the purposes of the following paragraphs, advantages are to be understood as any assets derived from the involvement, by any means, in any of the crimes of

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

pimping; sexual abuse of children or dependent minors; extortion; illicit traffic in narcotic drugs and psychotropic substances; arms trafficking; trafficking in human organs and tissues; illegal wildlife trade; tax fraud; trading in influence; corruption; and other offenses, as specified in article 1, point 1, of Law no. 36/94, of 29 September; and article 324 of the Industrial Property Code; as well as crimes punishable with a prison sentence of at least six months to more than five years, and the seizing of the assets obtained.

- ✓ Any person who converts or transfers advantages, or helps or facilitates the conversion or transfer of advantages, whether obtained by themselves or by a third party, directly or indirectly, for the purpose of concealing their illicit origin, or preventing the investigation or initiation of criminal proceedings against the offender or any complicit parties, shall be punished with two to twelve years of imprisonment.
- ✓ The same penalty applies to any person who conceals or disguises the actual nature, origin, location, use, transaction or ownership of the aforementioned advantages, or the associated rights.


Transfer or conversion of a monetary amount or of an asset, obtained by the themselves or by a third party, for the purpose of concealing their illicit origin or avoiding criminal liability. For instance, the signature of a contract in order to justify an undue payment.

FRAUD IN OBTAINING A GRANT OR SUBSIDY - article 36 of Decree-Law no. 28/84, of 20 January

- ✓ Any person obtaining a subsidy or grant through any of the following means:
 - Provision of inaccurate or incomplete information about themselves or any third parties, concerning issues of importance with respect to the awarding of the grant or subsidy, to the competent authorities or bodies;
 - Omission of information of importance to the awarding of the grant or subsidy, contrary to the legal regime applicable thereto;
 - Use of any document attesting to their entitlement to the grant or subsidy, or to facts of importance to the respective awarding, obtained by means of inaccurate or incomplete information;

Shall be punished with one to five years of imprisonment or the payment of a fine of 50 to 150 days.

- ✓ In particularly serious cases, the term of imprisonment shall be two to eight years.
- ✓ Should the offences in question be committed in the name, on behalf and in the interest

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

of a legal person or company, exclusively or primarily set up for this purpose, the Court shall order its dissolution, in addition to applying the adequate financial penalty.

MISUSE OF GRANTS, SUBSIDIES OR SUBSIDISED LOANS - article 37 of Decree-Law 28/84, of 20 January


- ✓ Any person who uses funds obtained through a grant or subsidy for any purposes other than those legally intended shall be punished with up to two years of imprisonment or the payment of a fine of at least 100 days.
- ✓ The same penalty shall apply to any person who uses funds obtained through a subsidised loan for any purposes other than those specified in the line of credit in question by the legally competent entity.
- ✓ The term of imprisonment will correspond to six months to six years, and the applicable fine to up to 200 days, if the amount involved or the resulting damages exceed €20,400.00.
- ✓ Should the offences in question be committed repeatedly in the name, on behalf and in the interest of a legal person or company, and the resulting damages not spontaneously repaired, the Court shall order its dissolution.

FRAUD IN OBTAINING CREDIT - article 38 of Decree-Law no. 28/84, of 20 January

- ✓ Any person applying for credit or any change in the conditions of a loan granted to an establishment or company through any of the following means:
 - Provision of inaccurate or incomplete written information, whether part of documentary evidence or relevant to the decision on the application;
 - Use of inaccurate or incomplete documents concerning the economic situation or the entity in question, namely balance sheets, profit and loss statements, general descriptions of assets, or expert opinions;
 - Concealment of any deterioration in the economic situation occurred in the meantime, in relation to the situation described on the date of submission of the application, deemed relevant to the decision on the application;

Shall be punished with up to three years of imprisonment or the payment of a fine of up to 150 days.

- ✓ The term of imprisonment may be extended to up to five years, and the applicable fine to up to 200 days, if the credit obtained through the aforementioned means exceeds €20,400.00.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

6. APPROVAL AND REVIEW

The senior managers of Alloga Logifarma are responsible for approving this Code.

The ANF Group Compliance Department and the Alloga Logifarma Technical and Quality Department are responsible for updating and circulating this Code.


This Code of Conduct is mandatorily reviewed every 3 years and whenever a change in the duties, or in the organic or corporate structure of ANF Group entities, justifies a review of the principles, values and rules to be followed by all managers and Employees, with respect to professional ethics.

7. LEGAL NOTICE

Compliance with this Code, which governs and guides the activity of Alloga Logifarma, its Employees and any other parties involved in its business and activities, is mandatory.

This Code only includes the principles and rules that should be followed, and is not intended to dispense with the reading and knowledge of the remaining internal documents and policies (available in the shared Quality folder), namely the following:

- ✓ Whistleblowing Policy;
- ✓ Regulations on Conflicts of Interest;
- ✓ Regulations on Offers, Donations and Sponsorships;
- ✓ Anti-corruption Policy;
- ✓ Prior risk assessment procedure, with respect to third parties;
- ✓ MAN-AL001 Alloga Logifarma Induction Manual;
- ✓ MAN-AL003 Internal Regulations – Control of Blood Alcohol and Consumption of Psychotropic Substances;
- ✓ Collective Bargaining Agreement, published in the Labour and Employment Bulletin.

	Manual	MAN-AL014
	CODE OF BUSINESS CONDUCT AND ETHICS <i>BUSINESS CONDUCT AND ETHICS CODE</i>	Effective Date 11 MAY 2023

8. TEMPLATES AND ARCHIVE

Code	Description	Archive Manager	Retention Period
---	---	---	---

9. VERSION HISTORY

Version	Change	Date
1	Initial version.	11 MAY 2023

10. APPROVAL OF THE MANUAL

	Function	Name	Date	Signature
Author	Technical Department of the Cabra Figa site and <i>Head of Quality Assurance</i>	Marta Faria		
Reviewed and Approved by	Executive Director	António Vicente		
Reviewed and Approved by	Chairperson of the Executive Committee	Inês Ferraz da Costa		