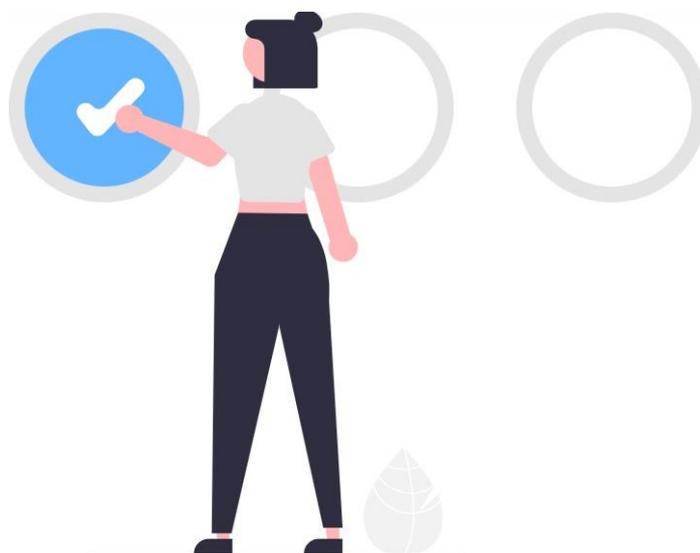


# CRIME PREVENTION POLICY

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## 1. EXPLANATORY STATEMENT

The Spanish Criminal Code (article 31 bis) establishes that **companies can be criminally responsible for crimes or breaches committed by their administrators, managers, employees, and in general people acting on their behalf and representation.**

Criminal responsibility can lead to various criminal penalties and may even compromise the effective functioning of companies, with consequences such as: dissolution of the company, suspension of activities, closing of premises, prohibition of contracting with the Administration, disqualification to obtain subsidies or benefits etc.

The criminal responsibility of a company occurs when there are no **adequate prevention and control mechanisms** within the companies, which allow to avoid the crime in question, or reduce its harmful consequences.

For Normon, it is essential to prevent and avoid illegal conducts that may result in fines, penalties, financial, economic losses and loss of reputation. Both for the company itself and the employees as individuals.

To this extent, Normon has a **crime prevention program** that aims to organize, prevent, manage and control the criminal risks that may occur in the company and, although avoiding the commission of crimes is the priority objective, the ultimate goal is to guarantee **culture of compliance** with all standards and maintain an **ethical corporate culture**.

## 2. PURPOSE

This Policy establishes a framework to **detect and prevent the commission of crimes**. It defines the principles of action and the bases of a crime prevention system with the purpose of eliminating, reducing or mitigating Normon's criminal responsibility for acts that may be committed under its coverage.

Through this Policy, it is desired to inform all Professionals of Normon, as well as third parties that have relations with Normon, a **resounding message of opposition to the commission of any illegal, criminal or any other similar act**. In no case the commission of a crime by a Professional (committed directly or indirectly) is justified, even if such action apparently produces a benefit of any kind, present or future, for Normon. Normon is also willing to combat these acts and prevent a possible deterioration of its image and its reputational value.

Consequently, this Policy is part of a system composed of regulations, procedures and other specific controls that make it reasonably possible to assure that the risks of committing crimes that affect Normon are properly **identified, documented, assessed, controlled and mitigated**, in an environment of permanent review and update (hereinafter, the "Crime Prevention and Detection System").

## 3. SCOPE

This Policy is applicable to Laboratorios Normon S.A. and to any other company in its group that formally adheres to it (hereinafter "Normon"), and is **mandatory for all members of the Board of Directors, managers and employees**, regardless of their function, rank, position, hierarchy, seniority, type of employment contract (indefinite or temporary) or geographical location in which they perform their work, as well as for all those who act on behalf of or on behalf of Normon (hereinafter the "**Professionals**").

The application of this Policy may be extended, in whole or in part, to any natural and / or legal person that maintains or will maintain a professional or business relationship with Normon, provided that the specific circumstances of the

case so advise and possible due to the nature of the relationship, thus, complying with Normon's Due Diligence processes in its selection of third parties to ensure compliance with the criminal regulations.

## 4. PRINCIPLES OF ACTION

The general principles of action of Normon's Crime Prevention and Detection System, and which govern this Policy, are the following:

- **Prevent and combat the possible commission of crimes or illegal acts** by any Professional of Normon in the exercise of their professional activities.
- Act, at all times, in compliance with applicable legislation and within the framework established by Normon's **Code of Conduct** and complying with Normon's internal regulations.
- Promote and stimulate a preventive business culture based on the principle of "**zero tolerance**" towards the **commission of criminal or illegal acts** and on the application of the principles of ethics and responsible behaviour of all Professionals.
- Generate an environment of transparency, integrating the different systems developed for crime prevention, maintaining the appropriate internal channels to favour the communication of possible irregularities, among which is the **Ethical Channel**.
- **Investigate any communication of an allegedly criminal act**, guaranteeing the confidentiality of the complainant and the rights of the persons investigated.
- Communicate to all Normon Professionals the **duty to report on any fact constituting a possible criminal offense or irregularity** of which they have knowledge, through the channels established in this regard.
- Establish and implement **internal standards, procedures and protocols** for action and decision, so that the Professionals can take decisions subject to control.
- Ensure that the **Compliance Officer** has the necessary **material and human resources** to monitor the operation and compliance of this Policy in an effective and proactive manner, without prejudice to the responsibilities of other departments and areas in Normon.
- Maintain and encourage proactive activities, aimed at **prevention and detection**, against reactive activities, such as investigation and punishment.
- Implement adequate and necessary **training** programs, with sufficient periodicity, and that transfer the requirements of the applicable legislation and of Normon internal procedures in such a way as to guarantee the correct updating of the knowledge of Normon's Professionals.
- Monitor that **disciplinary measures or sanctions** are imposed, when necessary, in accordance with the provisions of the applicable laws.

## 5. THE BASES OF THE CRIME PREVENTION AND DETECTION SYSTEM

Normon's Crime Prevention and Detection System is based primarily on 4 principles: **Prevention, Detection, Reaction and Monitoring.**

### 5.1. Prevention

The main elements to prevent the materialization of criminal offenses are the following:

- (i) A **Compliance Officer**, with autonomous powers of initiative and control, responsible for the **development, supervision and monitoring** of the Crime Prevention and Detection System granted with the resources and authority necessary for the development of its functions.  
The Compliance Officer will count with the support of the Senior Management and Directors of each Area/Department, to execute the controls related to the Crime Prevention and Detection System, as well as the related policies, procedures and standards.  
  
Among others, the Compliance Officer issues an Annual Compliance Report addressed to the Board of Directors describing the activity carried out throughout the year, as well as an Annual Compliance Plan describing the tasks to be promoted during the next year.
- (ii) **Financial resources management model**, intended to provide the Crime Prevention and Detection System with the resources necessary (economic, human and material) for its effective operation.
- (iii) **Normon's Code of Conduct**, which includes the **values, principles and guidelines applicable to all Professionals**. Likewise, the obligatory nature of its fulfillment and the duty to communicate, through the Ethical Channel, any breach of the same is included. Additionally, Normon may voluntarily assume the fulfillment of associative codes of the Sector.
- (iv) **Compliance and Crime Prevention Handbook**, which develops the main elements of the Crime Prevention and Detection System, including the **identification and evaluation of criminal risks** that could potentially affect Normon, as well as the existing **control environment** to prevent them and mitigate them, the financial resources management model, training and dissemination policies, the functions and responsibilities of the Compliance Officer, among others.
- (v) **Codes, Policies, Procedures and Protocols**, intended to ensure the effective ethical and compliance culture in Normon, and establish control mechanisms that minimize the risk of illicit behavior by Professionals.
- (vi) **Training and dissemination of the Code of Conduct and of the System for the Prevention and Detection of Crimes**, considered essential elements to **raise awareness and sensitize** all Professionals about compliance with legality, internal regulations and the values contained in the Code of Conduct.

### 5.2. Detection

Appropriate internal **mechanisms and channels must be established to favor the communication of possible irregularities**, so that the information can reach both the Compliance Officer and the Board, if necessary.

The main element of the Crime Prevention and Detection System aimed at detecting possible irregular conduct is the **Ethical Channel**. It can be accessed through the following ways:

**ETHICAL CHANNEL**

- **Email address:** [canal.etico@normon.com](mailto:canal.etico@normon.com)
- Through the **platform enabled** in the following link: <https://channel.globalsuitesolutions.com/normon>
- During a **face-to-face meeting** requested previously to the Compliance Area in the email address [canal.etico@normon.com](mailto:canal.etico@normon.com)

Through the Ethical Channel, complaints filed by the following subjects will be managed:

- Normon Employees (including trainees and employees during their training period, regardless of whether they are remunerated or not).
- Former Normon employees and candidates.
- Members of the Board of Directors of Normon.
- Normon Shareholders.
- Suppliers, contractors and subcontractors of Normon.

The following **matters** are object of complaint: Facts that may involve irregularities or well-founded suspicions of non-compliance with: (i) Violations of European Union Law in accordance with Directive (EU) 2019/1937, on the protection of persons who report breaches of Union law, and the Spanish Regulation regulating the protection of people who report on regulatory violations and the fight against corruption; (ii) Criminal offences, serious/very serious administrative offences.

Additionally, Normon's Personnel may file complaints regarding: (iii) Normon's Code of Conduct; (iv) Codes of Conduct to which Normon is adhered (AESEG, ANEFP); and (v) Irregular conducts or conducts contrary to applicable laws.

As for the Professionals' queries related to Compliance matters, these may be raised directly to the Compliance Area through an email sent to [compliance@normon.com](mailto:compliance@normon.com)

Thus, the Personnel has the **obligation to report irregular conducts related to the matters covered by the Ethical Channel** of which they have suspicion or knowledge in the exercise of their professional activities.

Normon will adopt the appropriate measures to preserve the identity and **guarantee the confidentiality and/or anonymity** of the data corresponding to the persons affected by the information provided, especially that of the person who had brought the facts to Normon's knowledge, in case identified.

The adoption of any type of **retaliation, penalty or impairment** (including dismissal and other disciplinary actions) against those who communicate a complaint in good faith through the channels set up for this purpose is totally **prohibited**.

### 5.3. Reaction

Non-compliance of this Policy will be sanctioned with a **disciplinary regime**, which will be applied taking into account the significance of the infraction and always with full respect for current **labor or commercial** regulations or the Collective Agreement that, at any time, is applicable.

Additionally, when appropriate, in the event of detection of a breach or potential breach of this Policy, the causes that have motivated it will be evaluated and **additional supervision and control measures** will be implemented.

## 5.4. Monitoring

The elements of the Crime Prevention and Detection System aimed at its adequate monitoring and supervision, as well as verification are:

- (i) Monitoring and supervision plan for the Crime Prevention and Detection System, whose main objective is to continuously validate the implementation of the System, **allowing to periodically check the effectiveness** of existing policies, procedures and controls, as well as their evolution, so that Normon has an overview of its System, allowing it to take the necessary actions to ensure its adequacy in the development of its functions of prevention, management and control of criminal risks.
- (ii) Verification of the Crime Prevention and Detection System, with the intervention of the third line of defense (external or internal **audit**). Audits will be carried out periodically, as well as when serious breaches of the System are detected or when there are organizational and / or legislative changes which make it necessary.
- (iii) Continuous improvement.

## 6. APPROVAL, UPDATE AND DISSEMINATION OF THE CRIME PREVENTION POLICY

This Crime Prevention Policy has been initially approved by Normon's Board of Directors on the **12<sup>th</sup> November 2019**, and has been amended for last time on the **30<sup>th</sup> of November of 2023**, being this version nº 5.

The Compliance Officer will be responsible for its implementation, monitoring and updating, making it available to all Normon Professionals and proceeding to its review and continuous improvement, especially when regulatory, social, business or of any other nature so require. In any case, it will be subject to annual review.

Likewise, Normon will provide this Policy to those natural and legal persons to which it applies.

Normon may request the Professionals and third parties to whom this Policy applies, to periodically confirm the compliance and content thereof.