



ETHICAL MARKETING POLICY

November 2023



1. Introduction

ROVI Management holds a clear commitment to regulatory compliance, ethical conduct and transparency.

This commitment encompasses all the phases that govern the development, manufacture, distribution, marketing, promotion and sale of our product and, to this end, policies that cover the most important aspects are implemented to ensure that all the members of the ROVI Group conduct their day-to-day work under the principles of professionalism, honesty and self-monitoring set out in ROVI's Code of Ethics.

The Ethical Marketing Policy (hereinafter, the Policy) expands on certain aspects included in the Code of Ethics, in particular in section 4.b of the Code, and its basic objective is to provide all the people who work or collaborate with the ROVI Group with a framework for action that allows them to comply with the ethical marketing principles adopted by our organisation.

2. Background

The World Health Organisation promotes the rational use of medicines to improve health and, to achieve this goal, considers it of fundamental importance that the different actors involved in the processes of marketing and selling medicines should act in accordance with ethical principles.

Therefore, in 1968, the WHO drew up a guide on drug advertising and, in 1988, it updated it in a new document entitled "Ethical Criteria for Medicinal Drug Promotion".

The commitments set out in said document have been developed in, among others, the EFPIA Code in Europe. The ROVI Group is a member of the EFPIA and has adhered to its code, as well as to many of the national codes in the countries where it operates, including the Code of Good Practice for the Pharmaceutical Industry in Spain.

3. What is ethical pharmaceutical marketing?

Ethical marketing consists of the voluntary application of ethical criteria in both marketing strategies themselves and the execution thereof, subsequent to training and awareness-raising among all the people involved in the relevant processes.

Ethical marketing is intended to achieve three goals: to meet the patient's needs, to promote society's well-being, and to promote and sell products responsibly. Therefore, **the objective of ethical marketing is to seek an appropriate combination of moral and economic principles when developing corporate strategies.**

It is of fundamental importance for marketing decisions to be guided by ethical standards of conduct in order to result in marketing strategies with a strong ethical component, such as: ethical products, fair and reasonable prices, ethics in distribution strategies and ethical promotion focused on values that furnish sustainability and reinforce the company's reputation.



In short, there is a wide range of moral elements to take into consideration when establishing marketing strategies and this is achieved by incorporating ethics into the decision-making process in relation to medicinal drug marketing.

4. Scope of application

This policy is directly applicable and mandatory for all ROVI Group companies, irrespective of their geographic location, and extends to all the activities carried on by the Group. Therefore, all ROVI professionals must respect and comply with it, regardless of their hierarchical level, geographic location and/or the group company for which they work.

Professionals who act as Group representatives in non-Group companies or entities will observe this policy in the course of said activity to the extent that it is not incompatible with the rules of the company or entity in which they represent the Group.

Likewise, those holding responsibilities at ROVI will promote compliance with these policies in companies and entities which ROVI is responsible for managing even though it does not hold a majority interest,

Likewise, it is important to highlight the fact that the principles set out in this policy must be considered when selecting marketing providers or providers of services related to the promotion or marketing of our products.

5. Applicable legislation and other mandatory rules

The activities of the marketing, promotion, sale, distribution or commercialisation of medicines carried on by the ROVI Group must be conducted in strict compliance with current legislation, in particular:

- The current legislation applicable in each territory.
- The EFPIA Code.
- The code of the national pharmaceutical industry association applicable in each territory.

Each employee is responsible for knowing and observing the competition laws applicable in each territory.

This Policy is set out in general terms and, therefore, it is possible that some countries may impose different requirements in this matter. Consequently, in the event of any doubt between the national rule and this Policy, the most restrictive requirement must always be applied.

6. Ethical pharmaceutical marketing and promotional actions: principles for action

It is of fundamental importance to inform healthcare professionals on the treatments available so that they can make informed decisions for the benefit of their patients. However, in order to comply with this principle, it is necessary for the pharmaceutical companies' marketing activities to meet ethical marketing commitments.

6.1. Scientific information and exchange



- ✓ When legislation so allows, the exchange of scientific information with healthcare organisations, healthcare professionals and/or authorities is permitted.
- ✓ The scientific information must previously be reviewed and approved internally by qualified reviewers.
- ✓ Any conduct intended to exercise undue influence over a healthcare professional is prohibited.
- ✓ Information to the general public on prescription medicines is not permitted, with the exception of information to shareholders and investors when this is required, always respecting the limits set by the applicable legislation.
- ✓ Requests for scientific information must be answered in accordance with the internal procedures in effect at any given time.

6.2. Promotional information

- ✓ Once marketing authorisation has been received¹, promotional information may be provided to healthcare organisations and healthcare professionals. All interactions must have a clear intention and transparent objectives and must not interfere with the independence of said professionals.
- ✓ Products may only be promoted in accordance with the uses authorised on the relevant technical data sheet.
- ✓ All marketing and promotional materials and activities must comply with ethical, medical and scientific standards, as well as all the applicable laws and regulations and the different codes of ethics or conduct to which the ROVI Group has adhered.
- ✓ Promotional materials and activities must be created accurately and meticulously, providing appropriate information to healthcare professionals so that they can make decisions using their own criteria. Furthermore, any data that are included or quoted in promotional materials and/or activities must not give a misleading impression of the results or scopes.
- ✓ All information provided to healthcare professionals must be in accordance with the current technical data sheet.
- ✓ Any conduct intended to exercise undue influence over a healthcare professional is prohibited.
- ✓ All promotional material must previously be reviewed and approved internally by qualified reviewers.

6.3. Samples

- ✓ Samples may only be handed out when local regulations so permit, within the periods they stipulate. Likewise, the samples must observe the provisions of said regulations.
- ✓ Samples must always be labelled as such and require the prior approval of the health authorities and the Group's relevant internal departments. Without approval, samples may not be given.
- ✓ Offering samples to healthcare professionals in exchange for the prescription, indication or administration of products is prohibited.
- ✓ Samples may only be given to healthcare professionals, never to patients, and must be duly documented.

¹ Local legislation may require compliance with additional requirements in order to promote medicines, such as the stipulation of a price.



6.4. Items for medical use

- ✓ Items for medical use may only be handed out when the local legislation or code so permits and must always respect the limits they establish. In no case may they be paid for with personal money.
- ✓ Gifts, courtesies or any kind of incentives are prohibited.

6.5. Scientific and professional meetings

- ✓ The ROVI Group may organise or collaborate in meetings of an exclusively scientific/professional nature but may not organise or collaborate in events that contain entertainment or leisure elements or activities.
- ✓ The holding of meetings or collaboration in organising them must always respect the applicable local regulations or code.
- ✓ All meetings must have a clear objective and be legitimately needed. They must be held transparently with no doubt as to their purpose and/or ROVI's participation.
- ✓ Meetings must be previously reviewed and approved by the relevant internal department.
- ✓ The venue and hospitality must respect the applicable local regulations or code in each case. Notwithstanding, they must likewise observe the following principles:
 - The quality of the scientific/professional programme must be the meeting's main focus of interest.
 - The venue chosen for the meeting must be appropriate to its scientific/professional purpose.
 - The level of hospitality must always be moderate and reasonable.
- ✓ Hospitality is subject to the following rules:
 - Its cost may not exceed the maximum fixed by local codes.
 - It must not be ostentatious.
 - Expenses associated to persons accompanying the attendees must not be paid and they should not be allowed to attend.
 - As a general rule, expenses may not be reimbursed to healthcare professionals and ROVI must organise and pay all the expenses associated to both the meeting and the hospitality. Minor expenses, such as taxis, may be reimbursed if a receipt is submitted.

6.6 Hiring healthcare professionals

- ✓ Healthcare professionals may be hired individually or in groups to provide advisory or consultancy services, such as speaking at or chairing meetings, training activities, meetings of experts, etc., that entail either remuneration and/or travel and per diem expenses.
- ✓ Hiring these professionals must respond to a legitimate need and must be previously reviewed and approved by the relevant internal departments.
- ✓ Selecting the professionals must be based solely and exclusively on their professional experience, skills and suitability for the service requested.
- ✓ Fees must be in line with the market value of the services provided.
- ✓ Healthcare professionals must not be hired with the purpose of exercising undue influence over their independent decision-making processes.
- ✓ All engagements must be documented in writing before they take place.

6.7. Relations with patients' organisations



- ✓ The ROVI Group's relations with patients' organisations must be governed by the following principles:
 - Independence: the independence of patients' organisations—in terms of positioning, policies for action and activities— must be guaranteed.
 - Mutual respect: any collaboration between patients' organisations and ROVI must be based on mutual respect, placing the same value on the standpoints and decisions of each party.
 - No promotion: ROVI will not request, and nor will patients' organisations accept, the specific promotion of a prescription medicine.
 - Transparency: the objectives and scope of any collaboration must be transparent. Any support (financial or otherwise) provided by ROVI will always be clearly recognised.

6.8. Donations and sponsorships

- ✓ The ROVI Group's donations must observe the provisions of the donations policy and the anti-corruption policy. Any donation to a healthcare organisation must always be aimed to improve healthcare or help or promote research. Donations to healthcare professionals are prohibited. All donations must be made publicly and transparently.
- ✓ ROVI may sponsor activities organised by healthcare organisations and patients' organisations. Any such sponsorship must observe the applicable local regulations, requires the prior review and approval of the relevant internal departments and must be public and transparent. Sponsorship of activities organised by healthcare professionals in a personal capacity is prohibited.

6.9. Ethical pharmaceutical marketing and the digital world

Practising ethical marketing goes beyond legal compliance since, due to technological progress, significant adaptation and evolution have taken place in many areas that affect promotional activities.

Given the digital era in which we live, ethical pharmaceutical marketing strategies are more important than ever before, since the Internet is an infinite source of information that, on occasions, may not be used appropriately. Pharmaceutical companies that use digital media as a platform to share information on their products, services and activities hold a significant responsibility.

The means or channel of communication used in no case exempts from the obligation to comply with the terms and conditions of current legislation and the applicable code, and those which, due to their intrinsic nature, characteristics, technical limitations, conditions of use, etc. do not allow compliance with the requirements and obligations imposed on each type of activity must not be used.

7. What measures does ROVI take to ensure ethical pharmaceutical marketing?

- ROVI guarantees ethical and responsible marketing by strictly respecting the law and the standards of conduct in place for the promotion, marketing and sale of its products. Furthermore, the company is subject to the Code of Good Practice for the Pharmaceutical Industry, which regulates, among other aspects, the promotion of prescription medicines in



Spain. Likewise, ROVI takes other codes, such as the EFPIA Code, as reference points for its activity related to medicine promotion.

- ROVI has internal procedures that ensure that all promotional materials and any activities that are conducted are reviewed and approved.
- 100% of the contracts with healthcare professionals are reviewed and there are approval criteria for all kinds of hospitality to doctors.
- Application of and compliance with the regulations is promoted, with training on these aspects. ROVI conducts annual training on the Code of Good Practice for the Pharmaceutical Industry and corporate policies, addressed to all marketing professionals, the sales network and the International and Medical Departments. It is important to design tactics aimed to raise awareness and provide training in business ethics in order to reinforce the moral aspects that should be considered by the members of the departments involved.
- The information on the Technical Data Sheets should be updated as soon as it is available.
- Experts are available to provide an accurate response to any question from healthcare professionals.
- Control methods are implemented through internal and external audits.
- ROVI strives to ensure that its employees act meticulously and that ethics is reflected in their actions.
- Supplier evaluation and selection mechanisms are put in place.

8. Distribution and training

To ensure the efficacy of this Policy, all employees who take part in the design, implementation or execution of activities related to the marketing, promotion, sales or commercialisation of our products must be trained in the content hereof.

9. Consequences of non-compliance

Failure to comply with this Policy may be penalised in accordance with the applicable legislation or the disciplinary system set out in the relevant Collective Labour Agreement. Likewise, the laws applicable in the different jurisdictions where ROVI carries on its activity will be considered.

10. Reporting infringements

Any infringement of the principles and obligations set out in this Policy must be notified to the hierarchical superior, the Compliance Department or the Ethics Channel as soon as possible. Failure to meet this obligation will be an infringement of this Policy and the Code of Ethics and may lead to the pertinent penalties and actions.

Likewise, agents, consultants and intermediaries are obliged to report any infringements of this Policy through the Ethics Channel for Suppliers.

11. Validity

The Ethical Marketing Policy was approved by ROVI's Compliance Committee at its meeting of 7 November 2023 and came into effect on said date.