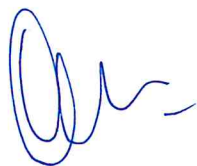
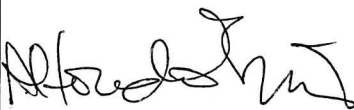
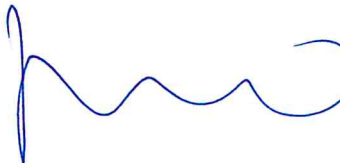



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CODE OF ETHICS AND CONDUCT OF CIC bioGUNE

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| Responsible: | Management | |
| Produced by: | Reviewed by: | Approved by: |
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| Date: 16/08/2022 | Date: 09/11/2022 | Date: 10/11/2022 |


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| Editions | | |
|-----------------|-------------|--|
| Number | Date | Description of the purpose |
| 1 | 10/11/2022 | Replaces the Code of Ethics |
| 0 | 01/01/2017 | Creation of the CIC bioGUNE Code of Ethics |

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I. Introduction and purpose of the Code

The Code of Ethics and Conduct (hereinafter, also the "Code") of the Association Center for Cooperative Research in Biosciences - CIC bioGUNE (hereinafter, "CIC bioGUNE"), is the guide for ethical and responsible behavior of the people who work at CIC bioGUNE in order to guarantee and consolidate in the association a culture based on ethics and the exercise of upright professional conduct, reinforcing the commitment to serving society.

The purpose of the Code of Ethics and Conduct is to reflect an ethically exemplary culture, as well as to expose the identifying values of CIC bioGUNE, seeking to promote in the association an infrastructure based on a culture of compliance, both in the criminal and extra-criminal spheres.

Although it is not intended to be exhaustive and cover all situations that may occur, the Code provides us with guidelines for our professional behavior, which are intended to assist us in making lawful and ethical decisions, taking into account our nature as a private non-profit entity and the regulatory framework that applies to us.


The Code also expresses CIC bioGUNE's commitment to its stakeholders (groups or people with whom we interact, including employees, client companies, suppliers, subcontractors or third parties) regarding the ethical model towards its management and efforts are oriented.

Thus, CIC bioGUNE intends to work with the community in which it carries out its activity, fostering and ensuring the necessary balance between its values and social expectations, while also promoting economic development and social action within the Autonomous Region of the Basque Country.

II. Scope

The Code of Ethics and Conduct is applicable to all members of CIC bioGUNE, in the fulfillment of their obligations and in their relationships with third parties, whatever their type of relationship, hierarchical or functional position, and especially to people who hold management positions and the people in charge of the different Research Areas and Groups.

Additionally, this Code is applicable to the companies and professionals that may be hired by CIC bioGUNE, provided that the contractual activity is associated or relevant to their activities. In this sense, the said companies and professionals will be required, in the respective contracts, to demonstrate compliance with the appropriate measures in terms of criminal risk prevention.

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Compliance with this Code is understood without prejudice to strict compliance with the provisions of the General Collective Agreement of the Chemical Industry, approved by Resolution of the General Directorate of Labor on 7 July 2021 (hereinafter, Collective Agreement), which is applicable thereto.

III. Values

The ethical values of CIC bioGUNE that must guide the actions of all its members are:

- INTEGRITY

The people who work at CIC bioGUNE must manage the public resources available to us with integrity, transparency and efficiency to achieve the scientific goals that give our activity meaning.

- PROFESSIONALISM


Committing to the values of CIC bioGUNE and continuously striving to increase our knowledge, skills and abilities are the foundations of excellent work. All of us who work at CIC bioGUNE must be willing to improve our professional qualifications, working with rigor and dedication to increase the efficiency and effectiveness of the organization.

- RESPECT

Recognition of the equal dignity of all people must be manifested in our daily dealings with our superiors and colleagues, and we should always treat other people with compassion and tolerance, just as we in turn would like to be treated. We also recognize our duty to respect the institution in which we work, maintaining a tactful and loyal attitude.

- RESPONSIBILITY

Responsibility means anticipating and taking responsibility for the consequences of our actions and decisions. Responding to the legitimate expectations inherent in our professional performance and accounting for the commitments made by CIC bioGUNE, beyond what is stipulated in the current legal framework, is part of our responsibility.

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IV. Conduct commitments

1. Compliance with legal provisions and prevention of criminal behaviors

- Be familiar with the laws affecting your work, as well as the applicable protocols, institutional and internal regulations and conditions established by the different financing institutions, requesting, where appropriate, the necessary information through your direct manager.
- Respect current legislation and other pertinent regulations and contractual clauses regulating the work carried out at CIC bioGUNE.
- Maintain a relationship with all the groups of interest linked to CIC bioGUNE based on compliance with the law and on mutual respect and trust.
- In relationships with supplier companies, clients or public administrations, strictly comply with laws, regulations and procedures, ensuring neutrality, objectivity and non-discrimination.
- Do not knowingly collaborate with third parties to break the law, nor participate in any action that compromises respect for the principle of legality, even if the order was given by a hierarchical superior.
- Inform the pertinent Managers at the institutions of any action of which we are made aware that is contrary to professional ethics and current legislation.

2. Dignified and respectful treatment of people


- All interpersonal relationships established at CIC bioGUNE, both internally and externally, must be based on mutual respect, dignified treatment and non-discrimination.
- Respect equal opportunities, ensuring a work environment where trust, dialogue and mutual support are a reality.
- Facilitate a balance between professional and personal life in our work environment as part of the comprehensive development of CIC bioGUNE workers.
- Know and apply the contents of *the Protocol against workplace, sexual or gender-based harassment* of CIC bioGUNE in situations of harassment and take the necessary measures to ensure compliance.

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- No worker of CIC bioGUNE may carry out or allow degrading treatment against any other, regardless of the position they hold. Any action implying contempt and/or harassment of another person, whether this involves sexual harassment or for reasons of sex, morals, religion, ethnicity, race, nation, illness, disability or any other personal, family or social circumstance, is completely prohibited.
- Ensure that in the policies and practices of selection, hiring and remuneration, the conditions of employment or access to training and promotion of the company's Professionals exclusively reflect criteria of merit and capacity, respecting, in any case, the principle of equality of treatment between men and women, while also guaranteeing non-discrimination based on race, sex, ideology, nationality, disability, belief or any other personal, physical or social condition.

3. Professionalism and integrity


- Every employee must comply with the obligations of the functions contractually entrusted to them, in accordance with the principles of good faith and due diligence, acting responsibly in the performance of their work and following the instructions received from their direct manager.
- Maintain an impartial attitude, acting with professional objectivity without accepting the influence of conflicts of interest or other circumstances that could undermine integrity. In terms of conflicts of interest, the provisions of the *CIC bioGUNE Protocol of Action in the Event of Conflicts of Interest* must be observed, accessible through the CIC bioGUNE intranet.
- Refrain from intervening or influencing decision-making, participating in meetings or accessing confidential information in those matters in which there is a conflict between their own interests and those of CIC bioGUNE.
- Reject favoritism, due to kinship, friendship or any other circumstance, in the hiring processes, promotion of people in the entity and other actions to be carried out in the exercise of the functions inherent to each job.
- Avoid engaging in any practice that could be considered less than exemplary and promote individual responsibility and personal example.
- Develop policies that ensure the proper training of CIC bioGUNE staff, contributing to their development at a professional and personal level.

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- CIC bioGUNE staff must make an effort at all times to maintain and improve their professional competence. They should also recognize the limits of their knowledge and skills and enlist the support of other qualified personnel if necessary.
- Ensure that CIC bioGUNE personnel are evaluated objectively and in accordance with their professional performance.

4. Fight against fraud

- Do not use the funds and resources of the institution for their own benefit.
- Do not accept favored treatment or a privileged situation, derived from the professional position or post held, offered by natural or legal persons, nor grant preferential treatment in favor of persons or institutions within the framework of client-supplier relations or in any other type of relationship in which you participate as a worker of the association.
- Reject any gift, favor, service or economic benefit from suppliers, contractors and any other area that goes beyond the usual, social and courtesy customs, or that may influence decisions, avoiding any risk of bribery, graft or other similar offenses.
- Do not deliver payments, gifts or other types of offers to public or private employees that may influence their decisions, avoiding any risk of bribery, graft or other similar offenses.
- Oppose all types of fraud and corruption in the exercise of functions, including practices related to money laundering, bribery or influence peddling, among other behaviors, both in relationships with providers and suppliers and with competitors and the Public Administration.
- Communicate any indication of fraud through the channels enabled for this purpose.
- Promote a culture that exerts a dissuasive effect for any type of fraudulent activity.
- Do not permit misleading, fraudulent or malicious conduct that involves undue or unfair advantages to be obtained.


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5. Transparency, good use of public resources and control of financial information

- Convey reliable information to society through the *Transparency Portal*, allowing a true picture to be formed of the activities, strategy and economic, social and environmental performance of CIC bioGUNE.
- Observe good practices in tax matters, complying with all tax regulations, refraining from obtaining illicit benefits and avoiding the payment of taxes, amounts withheld or that should have been withheld, or receiving any on-account payment in kind by means of which undue returns are obtained, or any other possible breach of accounting obligations.
- In those cases in which subsidies, deductions or aid are obtained from the Public Administration, ensure the correct use of the funds obtained for the purposes for which they are granted, as well as the efficient use of the public money received.
- Use the resources only for the performance of the work, ensuring they are used in a responsible and austere manner.
- CIC bioGUNE's economic-financial information will faithfully reflect its economic, financial and equity reality, always in accordance with generally accepted accounting principles and the applicable international rules on financial information.
- No worker will hide or distort the information in the accounting records and reports, which will in all cases be complete, accurate and truthful.
- Make sure of the lawful origin of the money or payments received, in order to prevent money laundering and the financing of terrorism.

6. Management commitment (tone at the top & tone from the top)

- People who hold leadership positions in CIC bioGUNE should be a personal and professional reference point for the rest of the institution's staff, fostering a culture of integrity and compliance with their daily conduct, being a constant example of the principles and values adopted by the association, as well as of the commitments assumed through this Code.
- They will also serve as support in the event of any doubt or concern felt by people subject to the Code concerning its interpretation and/or application, in collaboration with the Compliance Committee, and will never provide instructions contrary to the law or the contents of this Code.


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7. Appropriate corporate image and reputation


- Protect the external image that we convey in the exercise of professional activity, always displaying integrity.
- Develop behaviors that benefit the interests and reputation of CIC bioGUNE, helping to strengthen trust in our association.
- Do not use the name of CIC bioGUNE to carry out activities that are not part of our functions within the association.
- CIC bioGUNE's relationship with the media is reserved for personnel authorized for these purposes.
- Links, membership or collaboration of CIC bioGUNE staff with political parties or other types of entities, institutions or associations with public purposes that are developed outside the association's own activity shall be conducted in such a way that the personal nature of these activities is made clear, thereby avoiding any involvement on the part of the association, which will remain politically neutral at all times.
- The creation, membership, participation or collaboration of CIC bioGUNE staff in social networks, forums or blogs and the opinions or statements made therein, will be carried out in such a way that their personal nature is made clear, it being prohibited to use them, or mention or act on behalf of CIC bioGUNE in any of the above cases. If the statements are made in their capacity as staff of CIC bioGUNE, they should be made in an orderly and coordinated manner, their suitability having been approved by the direct manager, and sensitive or privileged information relating to the association shall always be kept secret and confidential as regards the media.

8. Proper use of information, computer media and data protection

- Make good use of confidential information relating to personal data and any other information that could be sensitive or privileged, both from work colleagues and client companies or other people related to CIC bioGUNE with whom we are in contact for our work.
- Put in place sufficient security measures to protect reserved and confidential information against any internal or external risk of non-consensual access, manipulation or destruction, both intentional and accidental.

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- Use the information to which we have access as employees of CIC bioGUNE in good faith, efficiently and appropriately maintaining the necessary discretion and avoiding its manipulation in the environment of the professional activity.
- The research staff charged with executing and developing research projects in collaboration, or under contract, must, in the course of the negotiations, safeguard all the information and pre-existing knowledge owned by CIC bioGUNE. The appropriate contractual documents will be signed in which the different interests, tasks or contributions of the parties are properly defined. Likewise, the obligation of secrecy and confidentiality assumed by the intervening parties, the assignment of ownership of the results generated within the framework of the project, and the possibility of their adequate and effective legal protection and the conditions of their exploitation shall be stipulated. All the above obligations must be expressly disclosed in advance to all participants in the research activities.
- Safeguard the documents and data that are part of the work at CIC bioGUNE, guaranteeing its adequate custody and transmission to eventual future managers.
- For the processing of scientific data, the following requirements must be observed:
 - All data must be kept for a minimum period of five years from the date of publication, with an extension to ten years being desirable, as recommended by European directives (except in cases where a longer period has been agreed upon or is recommendable).
 - In the case of data stored on electronic media, a backup system must be available.
 - Whenever possible, data and metadata should be integrated into existing databases or registries where it is publicly accessible, and seizure policies must be respected.
 - All files or records containing information about individuals must be obtained and stored in such a way that compliance with the Data Protection Law can be ensured.
 - All materials and samples that are the subject of research activities, and those derived therefrom, must be identified in an unequivocal and lasting manner, and must clearly indicate the project or protocol from which they originate. The storage of the materials must be performed in such a way that their adequate integrity, traceability and conservation during the established time is ensured at all times. In the event that there are reference repositories, it is recommended that the materials or samples be integrated into them.

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- All staff, to the extent that due to their professional activity they may have access to personal data, is obliged to maintain absolute confidentiality concerning this data and comply with the current legislation on the protection of personal data (Organic Law 3/2018, of 5 December, on Protection of Personal Data and guarantee of digital rights and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of this data).


9. Good scientific practices

Adjust work to the principles of integrity, transparency, loyalty, good faith and prohibition of arbitrariness, observing the strictest ethical and moral criteria applicable to research practice, ensuring research freedom and the promotion and expansion of scientific knowledge.

- Promote the exercise of research activity in a profitable, relevant and fruitful manner, in accordance with the strategic goals of CIC bioGUNE and the applicable regulations, and the results of the research work must be delivered in identical terms, obtaining as many authorizations as may be necessary prior to the start of each project, as well as throughout the same, and also informing concerning progress, possible delays or any incident affecting the development of each project.
- The research staff must record all the data and observations they obtain from the research activities (including preliminary, negative, unexpected or discordant results) permanently and with sufficient clarity to allow third parties to review and reproduce, to the extent possible, the work done.


10. Dissemination of results and protection of intellectual and industrial property rights

- The dissemination of results is an ethical duty of research staff, as a contribution to the increase and advancement of knowledge and as an essential part of the accountability process for the use of public media for research. The publication of the results obtained, either orally or in writing, is a fundamental activity of any research work since it is the means by which the results obtained by the international scientific community are communicated and can be criticized. Notwithstanding the foregoing, the publication of results shall be subordinated to potential requirements for the protection of industrial and intellectual property.
- Research staff should strive to publish their research results and interpretations in an open, honest, transparent, and accurate manner, including those results that are

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not in line with their hypotheses.


- Should errors be detected in the content of any publication, they must be acknowledged in publications of the same level. The retraction of the publication is necessary in the event of serious errors.
- To be able to appear as the author of a published work, it will be necessary: a) to have contributed substantially to the conception and design, to the collection of data and/or to the analysis and interpretation thereof, b) to have contributed to the preparation of the resulting document, and c) to be able to present in detail the personal contribution to the research and discuss the main aspects of the whole. Other people who have collaborated in the work, whose contribution is not sufficient to justify authorship, should be acknowledged in the acknowledgments section.
- The legal protection of the rights over Intellectual and Industrial Property assets must be ensured. No CIC bioGUNE worker may autonomously dispose of said property without the express written consent of the Management or hierarchical superior.
- If the research results obtained are eligible for intellectual or industrial property protection, due to their potential commercial value or because it is necessary for their best use, they must not be disclosed until CIC bioGUNE has been able to assess them. Possible delays in disclosure, when the aforementioned protection is intended, should be minimized.
- Do not use rights of third parties in matters of intellectual or industrial property or of their assignees, nor facilitate technological measures tending thereto, respecting their inventions, patents and know-how, when not duly authorized. In this regard, the need to validate new research observations or progress presenting or reproducing certain experiments will not be considered a violation of the intellectual property rights of third parties, as long as express reference is made to the information that must be validated and the presentation and/or reproduction carried out is useful and appropriate for this purpose.
- CIC bioGUNE research staff shall refrain from engaging in the following behaviors, among others:
 - o Distributing, plagiarizing, reproducing or communicating publicly a literary, artistic or scientific work, protected by copyright, without the authorization of the holders of the corresponding Intellectual Property rights or their assignees.

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- Reproducing, imitating, changing or usurping an identical or mistakable distinctive symbol (brand) of a third-party institution (to distinguish the same or similar products, services, activities or establishments for which the Industrial Property right is registered), without the consent of the owner of the registered right.
- Importing, possessing, using, offering or introducing procedures or results fundamentally protected by patents onto the market, without the consent of their owners.

11. Research with biological samples of human origin and/or animals used for experimentation

- Research staff who carry out research activities with biological samples of human origin must be especially rigorous in complying with the pertinent regulations.
- Research staff will have to request and obtain the express consent of the people who wish to be included in a research project or who provide biological samples, or their managers or representatives, where applicable.
- Any study that includes experimentation on animals must be approved by the Animal Bioethics and Welfare Committee (CBBA) of CIC bioGUNE, the authorized body and the Competent Authority.
- The staff participating in procedures requiring the use of experimental animals must possess the accredited training qualifying them as competent persons to carry out the functions foreseen in Spanish and European legislation.
- The procedures and projects in which experimental animals are used must be governed by the principle of the three Rs:
 - Replacing animals with other testing methods or strategies. The non-use of alternative methods to experimentation with live animals must be sufficiently justified.
 - Reduction of the number of animals used in the experimentation to the essential minimum that does not compromise the goals of the research.
 - Refinement or use of procedures that eliminate or minimize adverse effects on animal welfare.

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12. Safeguarding safety, health and the environment

- CIC bioGUNE shall actively apply a suitable policy for the prevention of labor risks, ensuring the adoption of safe and protective practices concerning the health of workers and respect for the environment.
- Regulations relating to safety and health at work must be complied with to prevent and minimize occupational risks to the extent possible.
- In particular, all staff must make proper use of equipment, devices, tools, dangerous substances, etc. and correctly use the resources and personal protective equipment provided (PPE) and the existing safety devices.
- The procedures and recommendations to mitigate the environmental impact of our activities on the environment must be followed.
- Unnecessarily spending energy and natural resources should be avoided, and we should use only those necessary to carry out our work.


13. Conservation of facilities, equipment and resources

- Respect the facilities, equipment and resources of CIC bioGUNE, avoiding damage and waste.
- Make efficient and responsible use of energy and the facilities and equipment of CIC bioGUNE, protecting them from any loss, damage or fraudulent and inappropriate use and limiting their use to professional purposes, in accordance with established regulations.

V. Ethical channel

All persons subject to this Code are obliged to report any fact that may contravene this Code, the internal regulations of CIC bioGUNE or the applicable legislation.

To this end, CIC bioGUNE has an Ethics Channel, accessible from the corporate website, through which possible breaches can be reported. Communications made through the Ethics Channel must be carried out using the form provided for this purpose and must be nominative, guaranteeing in any case the confidentiality of the complainant; the absence of retaliation and the principle of contradiction, without breaching the obligation of communication to the pertinent judicial or administrative authorities.

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The Compliance Committee is responsible for managing the Ethics Channel.

VI. Compliance Committee

The Compliance Committee is responsible for ensuring the observance and effective fulfillment of the commitments and behavior guidelines contained in the Code, promoting awareness, dissemination and understanding thereof by all members of CIC bioGUNE. Likewise, it shall be reviewed at least every two years and updated when appropriate in view of the concurrent circumstances.

The Compliance Committee is also responsible for assessing the notifications received concerning alleged breaches of the Code, channeling them as appropriate and applying the corresponding disciplinary regime. In the event of irregularities, especially those relating to cases of corruption and fraud, it will decide, where applicable, if the investigation should be referred to a third party.


Provided that the applicable legislation allows it, the Compliance Committee shall have access in a reasonable and proportionate manner to the information and documents of the association, its administrators, directors and employees of the association, including the minutes of the administrative, supervisory and control bodies, which may be necessary for the proper exercise of their functions.

CIC bioGUNE shall provide the Compliance Committee with the necessary human and material resources to carry out its duties.

All persons subject to the Code must provide the Compliance Committee with the assistance required for the proper exercise of its functions.

VII. Commitments regarding the Code

- All the members of CIC bioGUNE must know, accept and comply with the content of the Code, as well as complete the appropriate training to become familiar with and understand it, in order that the Code produce all its effects, this document constituting a mandatory rule.
- Managers who are in charge of other CIC bioGUNE workers must comply with and ensure that others comply with the Code, encouraging those acts, activities and actions that comply with the provisions thereof.
- CIC bioGUNE will communicate and disseminate the Code among its staff by making the document available on the Intranet and corporate website. In any case, all staff must assume, in a manner that reliably confirms said acceptance, the commitment

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to comply with it.

- Any doubt about the interpretation of the Code of Ethics should be consulted with the direct manager or, where appropriate, with the Compliance Committee.

VIII. What happens if the Code is violated?

Failure to comply with the values or rules of conduct contained in this Code will be punishable in accordance with the provisions of Article 64.5 of the applicable Collective Bargaining Agreement:

“(...) non-compliance with internal regulations when the worker has been previously informed of their existence and content. If this involves a manifest breach of discipline or has caused notorious damage to the company, it may be considered a very serious offense.”

IX. Entry into force and validity of the Code

CIC bioGUNE will carry out the necessary actions to ensure awareness and application of the Code by all persons subject thereto.

This Code will enter into force as of its approval by the Management and shall be mandatory from that moment.

This Code will be subject to periodic revisions and updates, and in an extraordinary manner, each time there are variations in the strategic goals or in the applicable legislation.

Any amendment or revision of this Code shall be conveniently communicated to the persons subject thereto.