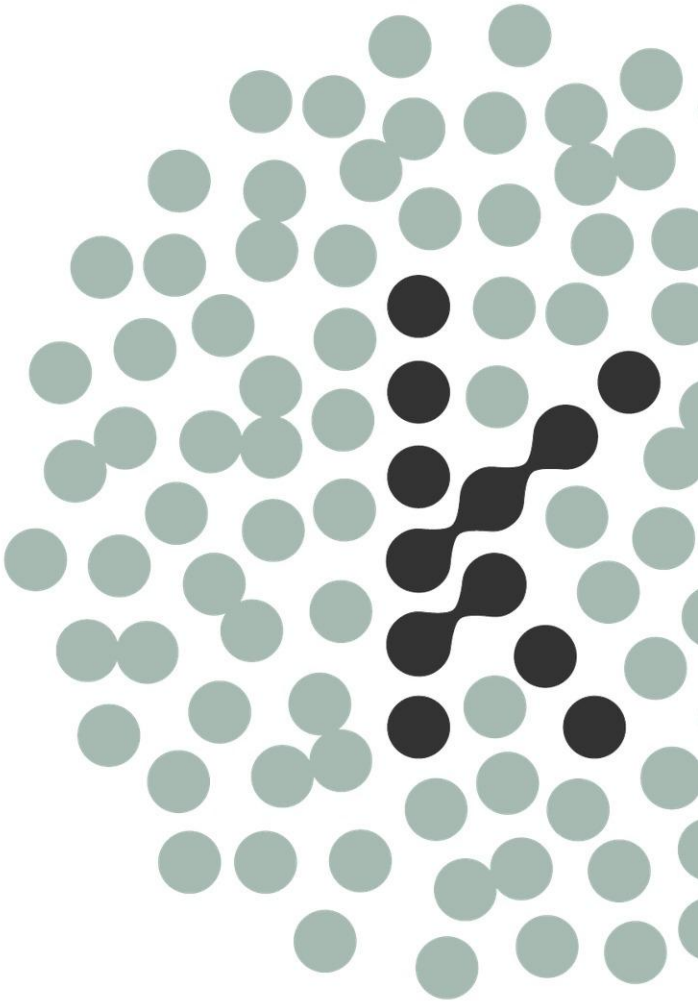
KYMOS GROUP



KYMOS GROUP

Code of Conduct

Version 3.0 · Approved by the Board of Directors on 10 November 2026

A message from the Chairman of the Board of Directors

Since the founding of KYMOS ("KYMOS", “KYMOS GROUP” or the “Company”) in 2001 by a group of scientists with extensive experience in the areas of research, development and quality control of the pharmaceutical industry, KYMOS has followed a path of continuous growth supported by people who share its founders’ commitment to innovation, continuous improvement, integrity and respect for people, the environment and applicable law.

On the occasion of its twenty-fifth anniversary, KYMOS GROUP operates laboratories in four European countries and provides services to clients across five continents. This growth has increased the Group’s responsibility to maintain a consistent culture of integrity, quality, scientific rigour and regulatory compliance across all its operations.

The continuous legislative and social changes in our environment reinforce our commitment to the values and principles set out in this Code of Conduct, which is the principal internal framework setting out the ethical values and standards of conduct applicable throughout the Group. This Code of Conduct contains the ethical principles that the Company applies across all areas of its activity and represents our commitment to comply with the applicable regulations and the ethical values. This Code is called to be a key tool so that we continue to be responsible, committed to acting with integrity, respectful of the law and human rights, transparent and alert to improper practices.

Being part of KYMOS GROUP implies being fully committed to the values of this Code of Conduct that sets clear principles that should guide the actions of our staff. All directors, officers, managers and employees throughout KYMOS GROUP must comply with this Code and conduct their activities in accordance with its principles and requirements.

In addition, KYMOS GROUP expects suppliers, contractors, agents, intermediaries and other business partners to comply with applicable laws and with ethical standards equivalent to those set out in this Code.

The Company has adopted measures to ensure strict compliance with this Code of Conduct and we will always be attentive to any practice that could risk a commitment to act in accordance with the ethical principles set forth in it. Likewise, we ask our employees that the same diligence, values and commitment guide their daily actions.

On my own behalf and on behalf of the Board of Directors of KYMOS GROUP, I would like to thank in advance the commitment of all the people who are part of the Company in complying with this Code of Conduct.

Yours sincerely,

Joan Puig Corcoy
Chairman of the Board of Directors

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01
Objectives and Scope of application

The purpose of this Code of Conduct is to establish the ethical principles and mandatory standards of behaviour applicable throughout KYMOS GROUP, to promote a culture of integrity and compliance with the regulation and the values of the Company. No breaches of the law, this Code of Conduct or internal policies are permitted.

This Code applies to directors, officers, managers, employees, temporary workers, interns and, where contractually agreed or appropriate to the nature of the relationship, consultants, agents, intermediaries and other business partners acting on behalf of KYMOS GROUP. This Code is binding on the persons within its scope. It complements, and does not replace, applicable laws, collective bargaining agreements, professional obligations, quality procedures and internal policies.

The shareholders and directors of KYMOS GROUP are guarantors of compliance with the obligations of this Code of Conduct. In addition, the heads of each business area of the Company shall ensure that this Code is applied and complied with within their respective area of responsibility.

All persons within the internal scope of this Code shall acknowledge, including by electronic means, that they have received and read it and undertake to comply with it.

> **OUR COMMITMENT**
>
> *All persons forming part of KYMOS GROUP are expected to act consistently with the principles and values of this Code of Conduct. In case any person is aware that the principles of the Code or the current legislation is infringed, they may report it using the Ethical Channel that the Company puts at their disposal.*

1.1. Shareholders

- Will exercise, in an informed and responsible manner, their voting rights in the General Shareholders' Meetings and, in doing so, will always demand the ethical performance of the Company, seeking the effective application of the Code of Conduct.
- Will appoint as directors' individuals who meet the necessary qualifications, experience, integrity and professional competence and who carry out a professional, ethical and responsible exercise of their management.

1.2. Directors and Managers

In the exercise of their functions of administration, direction and management, they must:

- Carry out a professional, ethical and responsible exercise of their activity following the values of good corporate governance and transparency.
- Comply with and enforce the Code of Conduct and, in order to do so, communicate and promote it and establish the appropriate mechanisms to guarantee its application.
- Provide shareholders with accurate and timely information on the Group’s position and prospects.
- Promote the effective participation of shareholders in the General Shareholders' Meeting, in particular by facilitating the exercise of their information and voting rights.
- Comply with and enforce the generally accepted accounting standards and principles and establish the internal and external control and risk management systems appropriate to the characteristics of the Company.
- Maintain the books and records of the Company with accuracy and honesty, in a way that allows obtaining information and making decisions in a conscious and responsible manner.
- Provide the Company's auditors and inspectors with all the information and explanations they require to carry out their work.
- Promote through their decisions, conduct and allocation of adequate resources, a culture of ethics, quality and compliance. Directors and managers must lead by example, encourage employees to raise concerns, ensure that reported concerns are addressed appropriately and refrain from applying or tolerating retaliation.
- No director or manager may instruct, encourage, authorise or knowingly tolerate conduct that would breach the law, this Code, an applicable quality requirement or an internal policy. Managers must not establish commercial, operational or financial targets that can reasonably be expected to encourage improper conduct or compromise patient safety, product quality, data integrity or regulatory compliance.

02
Compliance with applicable law and sector-specific regulations

2.1 Compliance with law

KYMOS does not accept any action that does not strictly comply with the law, regardless of the purpose it pursues. All members of KYMOS must always act within a framework of legality, respecting strictly and without exception the current regulations of each jurisdiction in which KYMOS GROUP operates.

> This Code applies without prejudice to the legislation in force in each country. Where local law imposes stricter or different requirements than those set out in this Code, local law shall prevail.

2.2 Compliance with sector regulations

The Company will comply with the highest safety and efficacy standards and guarantee the quality and safety of its business activity, always in accordance with Good Manufacturing Practices ("GMP"), Good Clinical Practice ("GCP") and Good Laboratory Practices ("GLP"), when applicable.

Fraud, falsification, manipulation, concealment and any other misconduct affecting the Company's activities, data, records, samples, results or quality decisions are strictly prohibited. Any actual or suspected instance of such conduct must be reported immediately.

2.3 Compliance with trade sanctions

KYMOS GROUP is committed to complying with all applicable laws and regulations relating to international sanctions, trade restrictions and export controls, including, where applicable, those imposed or administered by the European Union (EU), the United Nations, the United States (including the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC)) and the United Kingdom. KYMOS GROUP shall maintain appropriate risk-based due diligence procedures in relation to its business activities and counterparties and shall refrain from entering into, continuing or facilitating any transaction or business relationship where doing so would breach any applicable sanctions or restrictive measures.

2.4. Commitment to the Universal Declaration of Human Rights

All employees, directors and managers must respect the principles established in the Universal Declaration of Human Rights approved by the General Assembly of the United Nations.

03

Employment rights, equality, non-discrimination and prevention of harassment

The Company supports the principles of the International Labor Organization and defends the protection of workers' rights and respect for human dignity. Everyone has the right to develop their work freely and voluntarily. KYMOS GROUP prohibits forced labour, compulsory labour, human trafficking, modern slavery and unlawful child labour in its operations. The Group shall not knowingly engage or continue to engage with a business partner involved in such practices.

All its members undertake to offer dignified treatment to all persons, both internally and externally, and undertake to demand from their clients and suppliers that their actions be governed by the same principles and values listed here.

> **OUR COMMITMENT**
>
> *Kymos respects the individual rights of individuals and advocates a positive and inclusive work environment, exempt from any type of intimidation and harassment and is committed to promoting equal opportunities in all areas.*

Abuse of authority to exercise undue pressure, threats or control over a partner or staff member is prohibited. In relationships with colleagues, employees should be receptive, honest and courteous to each other and treated with respect.

3.1. Zero tolerance for discrimination

KYMOS GROUP does not tolerate discrimination based on sex, gender, gender identity or expression, sexual orientation, age, racial or ethnic origin, nationality, language, religion or belief, political or other opinion, disability, health condition, genetic characteristics, marital or family status, pregnancy, maternity, paternity, caring responsibilities, trade union membership, social origin or any other status protected by applicable law.

KYMOS GROUP is committed to providing a safe environment for all its employees, free from any form of discrimination or harassment. The Company does not tolerate workplace harassment, sexual harassment, harassment on grounds of sex, bullying, intimidation, retaliation or any other hostile, degrading, humiliating or offensive conduct. Reports shall be handled promptly, confidentially and impartially in accordance with the applicable protocol and local law, while respecting the rights of all persons involved.

The Company is committed to equal pay for equal work or work of equal value and to fair and transparent employment practices. Recruitment, remuneration, promotion, training and other employment decisions must be based on objective, job-related and non-discriminatory criteria.

Any hostile or humiliating act against any person shall be avoided.

WHAT SHOULD I DO IF…?

If an employee is aware of any behaviour or action that does not respect the principles listed above or others comparable with them, they will immediately report it to the Company in accordance with the applicable Protocols so that the Company can act and eradicate these unacceptable behaviours.

3.2. Freedom of association

Freedom of association and the right to strike shall be respected and appropriate measures shall be taken to prevent workplace harassment.

3.3. Use of the company's assets

The Company provides its employees with the necessary assets to perform their duties properly, but employees should never use these assets in an inappropriate or illegitimate way to achieve a benefit for themselves or the Company.

Company assets and technological resources must be used responsibly, securely and primarily for legitimate business purposes. Likewise, computers and computer systems must be used exclusively for the development of work activity, unless expressly authorized by the Company.

Laboratory equipment, reagents, samples, electronic records and any other material or information assets of KYMOS GROUP or of its clients must be protected against loss, theft, misuse and unauthorised access.

04
Health and safety at work

Safety at work is a priority for KYMOS, which respects and complies with current regulations at all times for the prevention of occupational hazards.

COMPANY OBLIGATIONS	PERSONNEL OBLIGATIONS
• Identify, assess and control occupational health and safety risks. • Provide safe facilities, laboratory equipment and working conditions. • Provide appropriate information, instruction and training. • Make suitable personal protective equipment available where required. • Investigate accidents, near misses and exposure events and implement appropriate corrective actions.	• Comply with applicable health and safety requirements and internal procedures. • Complete all required health and safety training. • Use laboratory equipment and personal protective equipment correctly. • Immediately report accidents, near misses, unsafe conditions, exposure events and deficiencies in safety controls. Cooperate in investigations and in the implementation of preventive and corrective measures.

No person may disable, bypass or improperly use a safety measure or protective device.

> **Safety is a shared responsibility:** everyone is expected to identify risks, act responsibly and speak up when working conditions are unsafe.

05

Protection of the environment and sustainable development

KYMOS GROUP is committed to conducting its activities responsibly, minimising their environmental impact and contributing to sustainable development across its operations and business relationships.

KYMOS GROUP is committed to:

01

Prevention and compliance

- Prevent pollution and environmental incidents.
- Comply with applicable environmental legislation, permits and internal procedures.
- Manage chemicals, solvents, biological materials, pharmaceutical residues and hazardous waste safely.

02

Resource efficiency

- Use energy, water and natural resources responsibly.
- Reduce waste and greenhouse gas emissions where reasonably practicable.
- Promote appropriate reuse, recycling and waste segregation.

03

Responsible supply chain

- Consider relevant environmental and human rights factors when selecting and monitoring suppliers and other business partners.
- Encourage third parties to adopt responsible and sustainable practices.

04

Shared responsibility

- Follow environmental procedures and waste-management requirements.
- Report spills, leaks, improper disposal and other environmental incidents immediately.
- Avoid practices that may cause unnecessary environmental harm.

06
Information security, cybersecurity, responsible use of AI, confidentiality and data protection

6.1 Information security and cybersecurity

New technologies cannot be used to carry out behaviours that are contrary to business ethics. The Company will ensure at all levels the proper use of information technology.

The Company has standards regulating the use of corporate technological resources by its internal or external users. It describes the acts that are prohibited because they pose a risk to the security of the systems and of the information assets of the clients, and of third parties. The use of the Company's IT resources implies the acceptance of these standards.

Personnel must comply with applicable information security policies and controls, including identity and access management, password and authentication requirements, secure handling of devices and removable media, software installation restrictions, classification and secure transfer of information, remote-working requirements (when applicable) and approved use of cloud and collaboration services. Credentials must not be shared, and access rights must not be used beyond the person’s authorised responsibilities.

Changes to supplier or client bank details must be independently verified using an approved verification method.

WHAT SHOULD I DO IF…?

1. Any **actual or suspected cybersecurity or information security incident** must be reported immediately through the designated incident-reporting process.

This includes loss or theft of devices, malware, phishing, unauthorised access, accidental disclosure, compromised credentials, unusual system behaviour and loss, corruption or unavailability of data. Personnel must preserve relevant evidence and follow the instructions of the incident response team.

2. **Suspicious emails, links, attachments, payment instructions, requests for credentials and other potential phishing or social-engineering attempts** must be treated with caution and reported to the IT Department.

6.2 Responsible use of Artificial Intelligence

KYMOS GROUP supports the responsible, secure and lawful use of artificial intelligence. AI systems and tools may only be used for business purposes where they have been approved in accordance with the applicable internal process and where their use complies with data protection, confidentiality, intellectual property, information security and quality requirements.

Confidential Information, personal data, client information, business secrets, unpublished scientific information, regulated records and GxP data must not be entered into a public or otherwise unauthorised AI system. Only approved tools and environments may be used, subject to applicable access, retention, contractual and security controls.

AI-generated outputs must not be assumed to be accurate, complete, unbiased or suitable for their intended purpose. A suitably qualified person must review and verify relevant outputs before they are relied upon, communicated externally or used to support a business, employment, scientific, quality, legal, regulatory or patient-related decision.

6.3 Confidentiality

Confidential Information includes any non-public information relating to KYMOS GROUP, its employees, clients, suppliers or other business partners, regardless of its format or the manner in which it was obtained. It includes business secrets, scientific and technical information, methods, results, samples, personal data, commercial terms, financial information, security information and information protected under confidentiality agreements.

It is essential that all employees of KYMOS GROUP respect the signed confidentiality obligations and carefully examine any situation in which it is intended to disseminate information outside the Company or its suppliers or customers. The employees will respect the rules of conservation and destruction of documents and the rules of computer security.

Sensitive information must never be disclosed to any third party, particularly where it relates to clients, without prior authorisation from Management. Any actual or suspected loss, unauthorised disclosure, alteration, destruction or access affecting Confidential Information must be immediately reported.

6.4 Privacy and protection of personal data

The Company and its employees must always be aware of the fundamental principle of the correct use and protection of personal data of all members of the Company and of the third parties with which they are related and must respect privacy, confidentiality and security of personal information to which they may have access by virtue of their specific functions. To this end, both the Company and the employees must strictly always comply with the applicable regulations regarding the protection of personal data. No person may access personal data unless duly authorised in accordance with the applicable access-control procedures and such access is necessary for the performance of their duties.

Personal data must be processed lawfully, fairly and transparently, for specified and legitimate purposes, and must be adequate, relevant, accurate and limited to what is necessary. It must not be retained for longer than permitted and must be protected through appropriate technical and organisational measures.

07
Antibribery and anticorruption

7.1 Conflicts of interest

There is a conflict of interest when the private interests of employees, directors or managers are not aligned with those of the Company, interfere with their obligations or lead them to act for reasons other than compliance with the responsibilities assigned to the Company. In any decision, employees, managers or directors, are obliged to act for the benefit of the Company and not in response to particular interests.

Actual, potential or perceived conflicts of interest must be promptly and transparently disclosed.

7.2 Prevention of corruption

- KYMOS GROUP and its directors and employees will never use their personal relationships or financial means to influence the decisions of a public officer or a private Company.
- KYMOS GROUP bases its relations with the public sector and the private sector, nationally and internationally, on the principles of transparency and equal opportunities, ruling out any illicit action that seeks to obtain an advantage over third parties.
- KYMOS GROUP prohibits bribery and corruption in all forms, whether involving public officials or private persons. Gifts and hospitality may only be offered or accepted where they are lawful, infrequent, reasonable, proportionate, transparent and connected with a legitimate business purpose. Gifts with a value exceeding 50 euros per person may not be offered or accepted without prior written authorisation from the Compliance Officer and/or the relevant authorised manager. Cash and cash equivalents are prohibited in all circumstances. Business hospitality in connection with sporting, cultural or other events may exceed this limit where it is appropriate to the circumstances, serves a legitimate business purpose and has been approved in writing in advance. Gifts or hospitality must not be intended, or reasonably perceived as intended, to improperly influence a decision or obtain an improper advantage and must not be offered or accepted during a tender, supplier selection, inspection, audit, regulatory decision or other sensitive decision-making process.
- Employees are obliged to pay attention to possible situations of non-compliance in matters of corruption, whether originating in the Company or in the clients or suppliers, and communicating said breaches through the Internal Information System.
- Employees may not solicit or accept any improper advantage from third parties or institutions.
- Charitable donations, sponsorships, grants and other contributions must have a legitimate and documented purpose and may only be made to reputable organisations established for an appropriate lawful purpose.

7.3 Financial operations

Accurate records

- All transactions must have a legitimate business purpose and be properly authorised.
- Transactions must be accurately and completely recorded and supported by appropriate documentation.
- False, misleading, incomplete or artificial entries, invoices, expense claims or supporting documents are prohibited.
- No undisclosed or unrecorded account, fund, asset, liability or transaction may be created or maintained.

Cash and business expenses

- Employees must not accept cash payments from clients, suppliers or other third parties.
- Cash may be used for minor business expenses where reasonably necessary.
- All expenses must be lawful, properly authorised, supported by an appropriate receipt or other evidence and accurately recorded.

Financial crime prevention

- Personnel involved in client onboarding, procurement, payments or other financial activities must remain alert to indicators of money laundering, terrorist financing, fraud, tax evasion and other financial crime.
- Suspicious or unusual transactions, ownership structures, payment instructions or requests must be reported immediately to the CFO and/or the Compliance Officer. The transaction must not proceed until the concern has been appropriately assessed.

Controls and audit cooperation

The Company must maintain appropriate internal and external financial controls, keep accurate books and records, and provide auditors with the information and explanations reasonably required to perform their work.

08
Clients, suppliers and competitors

8.1. Clients

All customers will be treated in the same ethical and professional manner regardless of the size of their business.

8.2. Suppliers

Suppliers and other relevant third parties shall be selected and monitored on the basis of objective, documented and proportionate criteria, which may include quality, technical capability, price, reliability, regulatory status, information security, data protection, business continuity and sustainability performance. All employees of the Company will strive to maintain cordial and professional relationships with suppliers.

8.3. Fair competition

KYMOS GROUP bases its action on the market on the principles of free competition and equal opportunities, promotes contractual good faith, and rules out adopting unlawful agreements or carrying out any action aimed at obtaining a benefit, advantage or unfair or illegitimate advantage over Customers, suppliers, competitors and other market players.

KYMOS GROUP shall compete independently and fairly. Agreements or coordinated practices concerning prices, margins, market or customer allocation, bid rigging, output restrictions, collective boycotts or other unlawful restrictions of competition are prohibited. Competitively sensitive information must not be exchanged with competitors unless the exchange is lawful, necessary and subject to appropriate safeguards.

The competitors will not be denigrated or described in a deceptive or unfair manner or their products or image will be discredited.

Information about competitors shall only be obtained by lawful means.

09
Other applicable regulations

9.1 Urban planning order

The Company shall comply with all applicable planning, construction, licensing, land-use and environmental requirements affecting their facilities and operations.

9.2 Political activities

The policy of the Company is to not make contributions to political parties.

9.3 Inside information and market conduct

No person may use or disclose inside information or other material non-public information obtained through their work for the purpose of trading, recommending a transaction or enabling another person to trade in securities or other financial instruments. Where there is doubt as to whether information is inside information, advice must be obtained from the Legal function before acting or disclosing it.

9.4 Intellectual property

The Company respects the intellectual property rights of third parties. Therefore, materials protected by third-party intellectual property rights may only be used where Kymos has a valid licence, authorisation or other lawful basis permitting the intended use.

No intellectual property may be copied or reproduced, in whole or in part, without the prior written authorisation of its owner. In all cases, the intellectual property rights of third parties must be respected.

The business secrets of KYMOS GROUP and those of third parties must be protected.

Software for which the Company does not hold a valid licence or other lawful right of use must not be installed or used on the Company equipment or systems.

Intellectual property created in the course of employment or while providing services to the Company shall be owned, disclosed and protected in accordance with applicable law and the relevant employment or services agreement.

10
Corporate compliance system

10.1 Prevention and control policy

KYMOS GROUP maintains a compliance and criminal risk prevention framework designed to prevent, detect and respond to criminal and other serious misconduct. The framework shall include risk assessments, policies and procedures, appropriate financial and non-financial controls, training, reporting channels, investigations, monitoring and periodic review.

10.2 Internal information system (Ethical Channel)

In accordance with Law 2/2023, of February 20, regulating the protection of persons who report regulatory breaches and the fight against corruption, the company has implemented an Internal Information System to communicate information on:

- Any actions or omissions that may constitute infringements of European Union Law.
- Acts or omissions that may constitute a criminal offence or a serious or very serious administrative infringement.
- In any case, all serious or very serious criminal or administrative infractions that imply economic loss for the Public Treasury and Social Security will be understood to be included.

All individuals who make up KYMOS GROUP have the duty to communicate through the Internal Information System any action or omission of the aforementioned. The Internal Information System (Ethical Channel) may be accessed by the following link: Ethical Channel.

The Internal Information System guarantees the confidentiality of the identity of the informant and any third party mentioned in the communication, and of the actions carried out in the management and processing of the same, as well as the protection of data, preventing access by personnel not authorized. Likewise, it allows the presentation of communications in writing or verbally, or both.

The Internal Information System is managed in accordance with its governing policy and procedure. All reports shall be handled with the highest degree of confidentiality and in accordance with applicable data protection requirements.

KYMOS GROUP strictly prohibits retaliation against any person who, in good faith or on reasonable grounds, raises a concern, seeks advice, provides information or participates in an investigation. This protection does not extend to persons who knowingly submit false or misleading information.

Personnel must inform the Compliance Officer where they become subject to a criminal, regulatory or administrative investigation or proceeding that may reasonably affect the performance of their role, create a conflict of interest, expose any company within KYMOS GROUP to legal or regulatory risk or materially affect the Group's reputation. This obligation shall be applied proportionately and in accordance with applicable employment, privacy and data protection laws.

10.3 Compliance Officer

The Compliance Officer is responsible for promoting, monitoring and coordinating the Group's compliance framework, with the support of the relevant business and control functions. The Compliance Officer shall have appropriate authority, independence, resources and access to relevant information and governing bodies.

The Compliance Officer does not replace the responsibility of directors, managers or employees to comply with the law and this Code. Legal, Quality, Human Resources, Finance, Data Protection, Information Security and other control functions shall cooperate within their respective areas of responsibility.

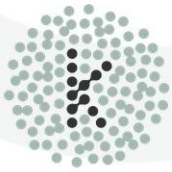
11
Final provisions

11.1 Consequences of non-compliance

Breaches of applicable law, this Code or related internal policies may result in corrective or disciplinary action, up to and including termination of employment or the relevant contractual relationship, in accordance with applicable law, collective bargaining agreements and internal procedures. Measures shall be proportionate and shall be adopted following an appropriate and impartial assessment of the circumstances and with due respect for the rights of the person concerned.

11.2 Periodic revision of the Code of Conduct

This Code of Conduct will be reviewed and updated in order to include modifications or improvements deemed appropriate to adapt it to legislative changes, changes in the structure of the Company or its activity or when areas likely to be improved are identified in general.



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