



Sustainability Policy of the PRIM Group
Approved by the Board of Directors of PRIM, S.A.
on 26 October 2023



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I. INTRODUCTION

PRIM was founded in 1870 with the aim of improving people's lives. Since then, the company has diversified its activity while remaining focused on the healthcare sector, placing patients at the heart of its business.

With regard to sustainability, and in line with the United Nations (UN), PRIM sees sustainable development as meeting the needs of the present generation without compromising the ability of future generations to meet their own needs.

Through this Policy, the company combines its century-old mission, vision and values with its social, environmental and ethical commitments by incorporating non-financial objectives into the organisation's corporate strategy to accommodate and satisfy the needs of all stakeholders.

II. LEGAL FRAMEWORK

This Policy was approved by the Board of Directors of PRIM, S.A. on 26 October 2023, under the provisions of article 249 bis of Royal Legislative Decree 1/2010, of 2 July, approving the revised text of the Capital Companies Act, which states that the non-delegable powers of the Board of Directors include the power to determine the company's general policies and strategies.

In preparing it, the recommendations set out by Spain's National Securities Market Commission in its Code of Good Governance for Listed Companies (as revised in June 2020) were taken into consideration.

III. SCOPE

This Policy is a mandatory framework for PRIM, S.A. and all the companies that make up the PRIM Group and will guide the development of governance and sustainability models for each business, which must be coherent and in line with the Policy.

In its application, the nature, scale and complexity of the risks inherent in the business model and the activities carried out by each company in the Group shall be taken into account, as shall compliance with the local and sectoral regulations applicable in each case.

Lastly, this Policy will replace the Corporate Social Responsibility Policy currently in force, which was approved by the Board of Directors of PRIM, S.A. in 2018.

IV. STRATEGY AND INTERNATIONAL COMMITMENTS

PRIM integrates non-financial objectives into the organisation's corporate strategy to accommodate and satisfy the needs of all its stakeholders: to provide tangible and intangible value that enhances its economic performance, to maximise its positive influence on society and to minimise the environmental footprint that PRIM, as a company, leaves in its wake.

The organisation is aware that the private sector shares responsibility for achieving the 17 Sustainable Development Goals (SDGs) included in the 2030 Agenda for Sustainable Development and approved by the UN. The ESG Master Plan, which is articulated through five axes and fourteen strategic targets, contributes, to a more significant extent, to the achievement of the goals in which it has more capacity to act and which allow the company to maximise the impact of its efforts.

From a global perspective, and in keeping with the organisation's activity, the five axes focus on making a greater contribution to *SDG 3 Good Health and Well-being*. The Plan also makes use of one of the characteristics that best defines the organisation: its commitment to technical training in the health sector. In doing so, the Plan broadens its scope and extends its contribution to *SDG 4 Quality Education*. In addition, its Equality Plan supports *SDG 5 Gender Equality*, and the fourth strategic axis focuses on reducing the organisation's environmental impact, aligned primarily with *SDG 13 Climate Action*. Finally, to further its commitment, the organisation seeks out strategic allies to contribute through partnerships, in accordance with *SDG 17 Partnerships for the Goals*.

PRIM is also a member of the United Nations Global Compact, the world's largest sustainable development initiative, committing to align its strategic operations with the ten universally accepted principles in the areas of human rights, labour standards, environment and the fight against corruption.

V. GENERAL PRINCIPLES

PRIM has defined eight principles of action whose transversality permeates all areas of the organisation and which serve as a guide for the development of a competitive and sustainable corporate model:

1. Regulatory compliance and ethical culture

PRIM rejects any illegal or fraudulent practice to obtain business advantages and has control mechanisms in place to prevent, identify and sanction any practice that contravenes current regulations or the organisation's internal code of ethics.

2. Good governance

PRIM bases its governance model on business ethics and transparency, respect for the rules of the free market and free competition, and the promotion of diversity as a valuable source of corporate wealth. Consequently, it rejects any action contrary to the rules of good corporate governance or any of its other internal rules and policies and has control mechanisms in place to prevent, identify and sanction such actions.

3. Fiscal responsibility

PRIM manages its tax obligations prudently and transparently, following the principle of regulatory compliance. Its tax responsibility model impacts the economic and social development of the countries in which the organisation operates through the payment of taxes.

4. Transparency and communication with stakeholders

PRIM is firmly committed to transparency as the only means of generating confidence in the market. Consequently, it develops tools that facilitate access to accurate and up-to-date financial and non-financial information on the organisation's performance and strategy, in compliance with current legal requirements.

The company also strives to establish stakeholder communication channels that enable a swift and direct two-way dialogue.

5. Risk management

PRIM's Board of Directors, as the highest governing body, is in charge of supervising the internal information and control systems, as set out in the Risk Control and Management Policy. As a guarantee of independence, both the Internal Audit Department and the Compliance and ESG Department report functionally to the non-executive Chair of the Company.

The cross-cutting nature of the operational model is articulated through the three lines of defence approach, whereby all the functions of the organisation work in coordination to achieve the objectives, taking on roles associated with diagnosis, planning and execution (first line), supervision and control (second line) and ensuring that the process works effectively and efficiently (third line).

6. Protection of Human Rights

PRIM has scrupulous respect for people's rights, taking the United Nations declarations on human rights and labour as a reference and adopting the Ten Principles of the Global Compact and the UN International Bill of Human Rights as its own.

Furthermore, PRIM supports the Tripartite Declaration of Principles concerning Multinational Enterprises, the Social Policy of the International Labour Office and the Guiding Principles on Business and Human Rights ("Protect, Respect and Remedy") and takes into consideration the OECD Guidelines for Multinational Enterprises and

the principles and rights set out in the ILO Declaration on Fundamental Principles and Rights at Work and its conventions.

7. Diversity and equal opportunities

For PRIM, gender, functional, cultural and generational diversity is a source of wealth within its organisation. These different realities help to shape a broad and mature culture that boosts the company's competitiveness and seeks the admiration and respect of all the people who are linked to PRIM.

PRIM rejects any type of discrimination in the workplace or acts constituting moral, sexual or gender-based harassment and has a model for preventing, identifying, investigating and sanctioning this type of conduct.

8. Commitment to society and health

Through the activities inherent to the company, PRIM contributes to the advancement of healthcare and the progress of the communities in which it operates.

Through its PRIM Social programme, it further develops its commitment through partnerships that allow it to draw on the strengths of the different agents involved to address the challenges that we, as a society, currently face. The organisation collaborates with healthcare institutions, research centres and non-profit organisations working in global medicine, education and equal opportunities.

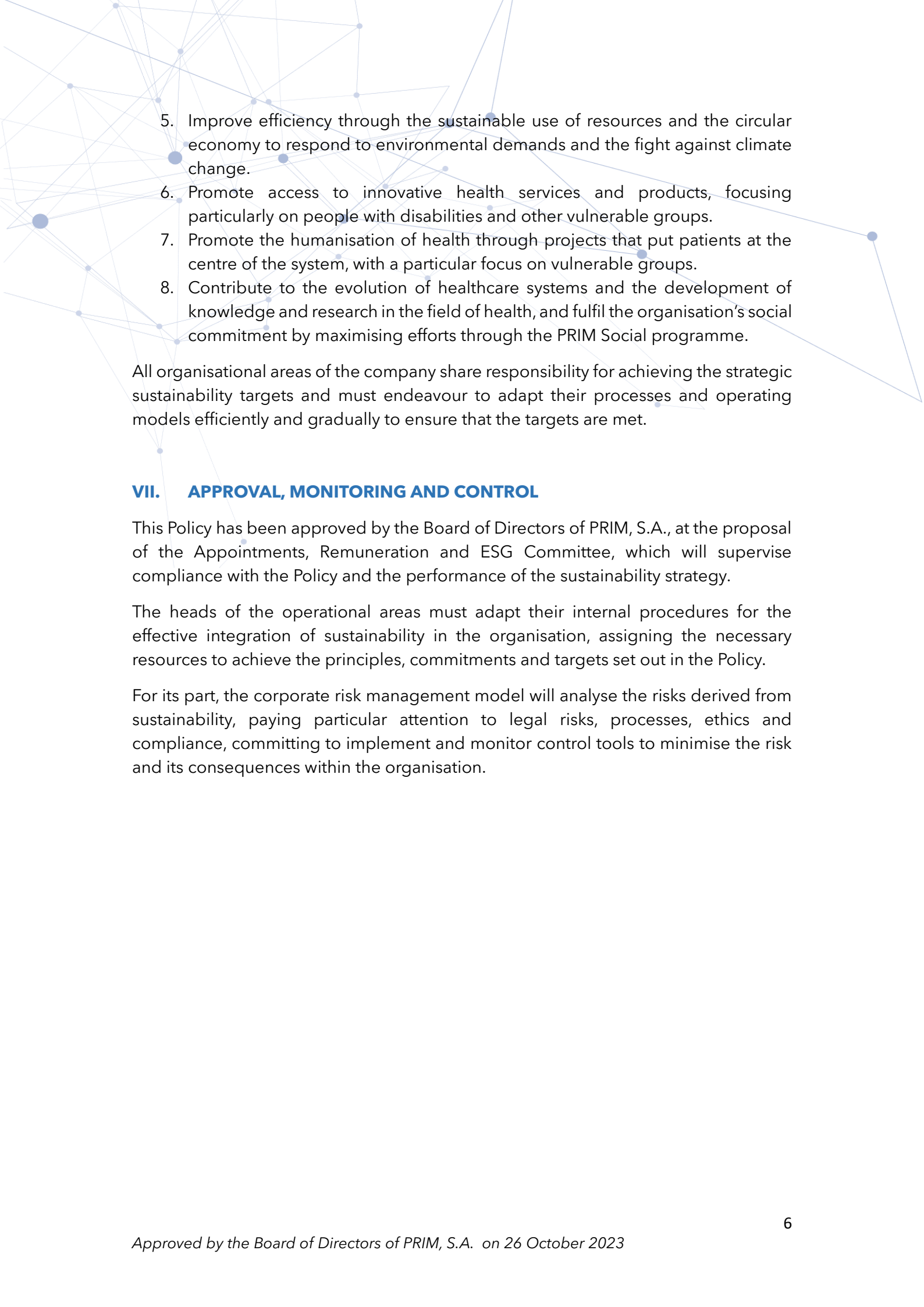
9. Commitment to the environment

Through its environmental management system, PRIM seeks to minimise the impact of its activity on the environment and concentrates its efforts on optimising the use of resources, effective waste management, promoting the use of renewable energies in its workplaces and maximising the life of its products. The company strives to make solid progress in the fight against climate change and to adapt the organisation to its consequences, as well as to establish the necessary mechanisms to protect biodiversity.

VI. SUSTAINABILITY TARGETS

PRIM has set seven strategic targets whose main aims are to ensure the robustness of its governance model, maximise its impact in the health sector and significantly reduce the environmental footprint of its activity.

1. Strengthen the sustainability governance structures to facilitate their integration across the Group and support the fulfilment of the strategic plan.
2. Consolidate a diverse and collaborative leadership model with a motivational culture committed to addressing global health challenges.
3. Make progress in the commitment to disability through policies and tools that promote access and effective inclusion within the organisation.
4. Increase the portfolio's sustainability and integrate the principles of respect for the environment and human rights throughout the value chain.

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5. Improve efficiency through the sustainable use of resources and the circular economy to respond to environmental demands and the fight against climate change.
 6. Promote access to innovative health services and products, focusing particularly on people with disabilities and other vulnerable groups.
 7. Promote the humanisation of health through projects that put patients at the centre of the system, with a particular focus on vulnerable groups.
 8. Contribute to the evolution of healthcare systems and the development of knowledge and research in the field of health, and fulfil the organisation's social commitment by maximising efforts through the PRIM Social programme.

All organisational areas of the company share responsibility for achieving the strategic sustainability targets and must endeavour to adapt their processes and operating models efficiently and gradually to ensure that the targets are met.

VII. APPROVAL, MONITORING AND CONTROL

This Policy has been approved by the Board of Directors of PRIM, S.A., at the proposal of the Appointments, Remuneration and ESG Committee, which will supervise compliance with the Policy and the performance of the sustainability strategy.

The heads of the operational areas must adapt their internal procedures for the effective integration of sustainability in the organisation, assigning the necessary resources to achieve the principles, commitments and targets set out in the Policy.

For its part, the corporate risk management model will analyse the risks derived from sustainability, paying particular attention to legal risks, processes, ethics and compliance, committing to implement and monitor control tools to minimise the risk and its consequences within the organisation.