



# CODE OF ETHICS

We are what we do: our actions define who we are and what we stand for as an organization.

*February 2025*

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# Message from the company.

This Code of Ethics is the tool that helps us represent what defines us: our values. These are the elements that govern the professional behavior of all of us who are part of this great Organization, reflect who we are, and make it clear to everyone else what they should or should not expect from us.

The purpose of the Code of Ethics is to express that KKR INCEPTION BIDCO, S.L.U. (the "Group", the "Organization" or the "Company") is committed to legality and best practices, as well as to helping all our professionals act ethically, honestly, honorably and transparently at all times, in accordance with our values and principles.

Our purpose "We bring your dreams to life through cutting-edge innovation and individualized care, for a healthier future" is at the core of our identity as an organization. It defines us, inspires us, and guides our actions to create a positive impact on society.

Through this Code, we hope to continue being known for what we are and what we want to be: a leading Group for where life is born.

**Prof. Antonio Pellicer**  
*Founder*

# 1. Introduction.

This Code of Ethics demonstrates the Company's commitment to legality, best practices and ethics. It is essential to comply with our values, which are part of our commitment to integrity and professional excellence.

## 1.1. WHAT IS THE CODE OF ETHICS?

The Group's Code of Ethics is an essential Company document that sets out our purpose and values.

This Code also reflects our corporate and social commitment to ethical responsibility in all our relationships with patients, suppliers, agents and other stakeholder and to adhering to the legislation that governs the Group's activity and the internal regulations that must be complied with in the Company.

## 1.2. SCOPE OF APPLICATION.

This Code of Ethics applies to everyone in the Group, regardless of their contractual status, hierarchical position, responsibilities or where they work.

It will also apply to any outside parties that the Company may have relations with, such as clients, suppliers, contractors and any other stakeholders, companies and individuals that provide any type of professional services at any of the Group's work centers or who have relations with the Organization, so that they will understand our ethical principles and values and adhere to them themselves.



# 2. Our purpose and values.

## 2.1. WE BRING YOUR DREAMS TO LIFE THROUGH CUTTING-EDGE INNOVATION AND INDIVIDUALIZED CARE, FOR A HEALTHIER FUTURE.

Our purpose reflects the profound commitment that brings us together. It not only defines what we do but also the impact we strive to make in the lives of our patients, in society, and within our team.

Our work goes far beyond medical treatments it's about creating hope for those navigating the challenges of their journey to parenthood. We bridge science and humanity, ensuring every decision is driven by our passion for helping dreams come true and our unwavering dedication to delivering exceptional care.

We see our mission as a contribution to global well-being, ensuring every action aligns with the highest ethical standards while putting people at the heart of everything we do. This purpose gives meaning to every accomplishment because behind every breakthrough is a story to share and a dream to fulfill.

It's our team that brings this purpose to life dedicated professionals whose commitment, passion, and drive to make a difference inspire us to keep moving forward. Our clinics and offices are where dreams take shape, respect and collaboration flourish, and together we're building a healthier tomorrow.

Our shared values flow from this purpose. They are the guiding principles for our decisions, professional relationships, and the way we approach our work. Every action we take, every step we make, and every milestone we reach reflects our commitment to transforming lives and shaping a better future.

## 2.2. OUR VALUES: THE FOUNDATION ON WHICH EVERYTHING IS BORN.

**Patients Centricity.** Our main objective is the satisfaction of each of our patients, who are the reason behind, and the focus of, everything we do, thus constituting our primary value: The patient comes first.

**Teamwork.** Teamwork is the reason why we are a benchmark for talent and innovation in our sector. Our team is the most valuable resource for us to achieve excellence every day.

**Excellence.** Our excellence keeps us as a benchmark for everyone who wants to fulfill the dream that we are specialists in making come true: to have a child. This objective gives rise to our focus on innovation, which sets us apart as the key for continuously improving both our science and the service we offer.

**Honesty.** We work with care and attention to detail, with honesty as a fundamental principle, which is reflected in all our relationships.

**Innovation.** Innovation is one of the fundamental pillars of the Company, as it works to bring together and promote the most experienced and talented research personnel, to share knowledge, to perfect techniques and to mark the present and shape the future of assisted reproduction.

# 3. Elements that define our values.

The commitments that underpin each of our Values are as follows:

## 3.1. COMMITMENTS TO PATIENTS.

1. Integrity. Defined as the best professional practice, it is not just an option, but an unquestionable conviction of everyone in the group.

2. Honesty. Providing accurate information is a basic principle in our actions, so the information we convey is always truthful and reliable.

3. Quality of service. We are committed to providing quality service, combining the expertise and scope of our resources, experience and knowledge to help each patient meet their needs and solve their problems.

Our relationships with patients and donors will be governed by the highest standards of product and service quality, confidentiality in data processing, transparency and legality in our contracts with them.

4. Patient safety. Patient safety is a key element of our corporate culture. That is why we have put the best procedures and protocols in place to ensure our patients are duly protected and to allow early detection of any situation that could affect their safety.

5. Professional behavior. Complying with laws, regulations and professional standards and working to avoid any action that may discredit our organization or our profession.

6. Prohibition of discrimination. We reject acts of discrimination against patients or donors on the basis of sexual orientation, gender identity, religion, national origin or any other discriminatory criteria.

7. Confidentiality and data protection. For us, information and knowledge are one of the main indispensable assets necessary for managing a company. That is why we make sure to keep any non-public data secret that we may access due to our work, and not to use information improperly, which could be an offense against corporate secrecy.

8. Scientific rigor and innovation. We base our dealings with patients, our results, and our reputation on accurate, scientifically proven and transparent results. Our goal is to achieve excellence in all our processes and services.

The ongoing work of our scientists and incorporating the latest techniques allow us to improve gestation rates every year: 9 out of 10 couples who come to the organization because of fertility problems achieve their goal.

9. Ethics in our research. We carry out our laboratory and research work in full compliance with the applicable legislation, and unethical practices and practices that contravene, among other issues, the laws on protecting animals used for scientific purposes and the legislation on biomedical research, are strictly forbidden.

Any type of genetic manipulation that does not respond to legitimate legally established purposes is also strictly prohibited.

The organization has set up various ethics committees, made up of external personnel, that oversee best practices in innovation and research and promote healthy debate and collaboration with experts to develop innovative solutions in an ethical and sustainable manner.

10. Experience. We have more than 30 years of experience in the sector. In this sense, all of our medical staff, the employees in embryology and the rest of the organization are potential discoverers of new techniques and new solutions that could help reproductive medicine move forward every day, having been recognized on a global level on many occasions.



### 3.2. COMMITMENTS TO OUR TEAM.

1. Human rights and civil liberties. The group respects and protects, in all its activities, the human rights and civil liberties recognized in the universal declaration of human rights, and in the convention for the protection of human rights and the dignity of human beings as regards applying biology and medicine.

We reject child labor and forced or compulsory labor. In addition, we support freedom of association and effective recognition of the right to collective bargaining. This is all in accordance with our human rights policy.

2. Well-being and active listening. The group is committed to actively listening to its team through its various communication channels, establishing horizontal communication and promoting annual climate surveys to find out the degree of its professionals' satisfaction, improve the well-being of the team and promote employee engagement actions.

3. Diversity, non-discrimination and equal opportunities. We believe that respect is a fundamental value in the workplace, which is why we foster a culture and work environment

in which our professionals treat each other with respect, courtesy and fairness, promoting equal opportunities for all. We are committed to the fight against discrimination in all its forms, whether direct or indirect, rejecting any type of discrimination based on race, nationality, social origin,

Sex, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition people may have. We promote and value a diversity of people, points of view, talents and experience within our organization. Our corporate diversity, equity and inclusion policy is the framework for our commitment to respect and diversity in all its forms.

We promote equal treatment between men and women in terms of opportunities, access to employment, training, promotions and working conditions. We are also committed to a work-life balance.

We express our commitment to preventing, avoiding, resolving and sanctioning any cases of labor or sexual harassment that may occur, as the only way to guarantee dignity and integrity for all.



4. Respect and prohibition of any conduct constituting harassment. In the organization, we reject any manifestation of physical or moral harassment or abuse of authority, and any conduct that may generate an intimidating or offensive environment for the rights of individuals, in accordance with the policies, protocols and procedures in force in each region regarding the prevention of sexual and/or labor harassment, and our current zero tolerance policy for harassment, which is binding for all professionals working in the group, regardless of which jurisdiction they work in.

We work to build relationships based on full respect, dignity of others, participation, equity and synergy, fostering a respectful work environment with the objective of achieving a positive working climate.

In addition, we respect the right to personal and family privacy of all individuals, in all its manifestations and, in particular, with regard to personal data. In this sense, we are committed to maintaining the confidentiality of personal data and not letting it be disclosed without the consent of the parties concerned or in cases of a legal obligation or to comply with a court or administrative order.

5. Occupational health and safety. Occupational health and safety and prevention policies are a priority for ensuring a risk-free and safe working environment in all our facilities.

We place special importance on providing a healthy, pleasant and respectful environment, avoiding harmful, aggressive or abusive behavior and making responsible use of our resources and facilities. Constantly improving our working conditions and safety in our facilities is one of our corporate objectives.

In this sense, we provide all the means at our disposal to develop the corresponding occupational health and safety policies and adopt the necessary preventive measures to comply with the applicable legislation, and any other laws that may be developed in the future, and we measure our main occupational health

and safety indicators to make sure we are always improving them.

6. Responsible use of resources. We provide our team the resources they need to carry out their work, and we are committed to ensuring they have the necessary means to protect and safeguard these resources.

7. Information systems. The group takes all necessary measures to safeguard the integrity and security of our information systems.

8. Loyalty to the company, impartiality and conflicts of interest. A conflict of interest is considered to exist when professionals' personal interests directly or indirectly conflict or collide with the company's interests, interfere in how they fulfill their professional duties and responsibilities, or entail them being personally involved in any of the company's economic operations and transactions. Our relationships with our employees and the third parties we interact with is based on the loyalty that arises from having shared interests.

The professional decisions adopted at all times in the professional sphere must be based on the best defense of the group's interests, so that they are never influenced by personal or family relationships or any other particular interests.



### 3.3. COMMITMENTS TO SOCIETY

1. Compliance with legality and contractual obligations. We carry out our business and professional activities on the basis of scrupulous adherence to the company's internal regulations and the current legislation.

2. Truthful advertising and social networks  
To guarantee fair, loyal, free and transparent competition, the group does not carry out comparative advertising that refers to other companies or uses other companies' distinctive signs with the intention of denigrating them in the market or undermining their prestige.

We ensure the proper use of the company's logo and its reputation in all our professional activities, especially in our public interventions and use of social networks.

3. Relations with public administrations. Our relations with public administrations are guided by respect for institutions and transparency. Any act related to bribery or influence peddling will be punished and denounced.

4. Prevention of corruption. We express our firm and rigorous rejection of any type of corruption, bribery or extortion, and we are categorically opposed to influencing the will of people outside the company to obtain a benefit or advantage

of any kind through the use of practices that contravene the law or the principles and standards of conduct contained in this code.

In this sense, receiving, providing, promising or offering any kind of payment, fee, commission or gift to any authorities or public officials or members of private entities is not permitted, provided that due to their frequency, characteristics or circumstances they could be interpreted by an objective observer as being made with the intention of affecting the impartial judgment of the recipient. However, this prohibition does not include:

- Advertising materials of little value.
- Gifts that respond to signs of courtesy or standard business amenities.
- Occasional gifts for specific and exceptional causes, provided they are not in cash and are within reasonable and modest limits.

5. Prevention of money laundering. We comply with national and international anti-money laundering legislation. We express our firm commitment not to engage in practices that may be considered irregular in our relations with patients, suppliers, providers, competitors, authorities, etc., including practices related to laundering money from illicit or criminal activities.

6. Tax obligations, obligations to public administrations and customs regulations. We are diligent in complying with our tax obligations, and all the obligations arising from our relations with Public Administrations. We are committed to fully complying with the customs regulations established by the European Union in each of our import and export activities.

### 3.4. HONESTY AND ACCOUNTABILITY TO STAKEHOLDERS.

1. Ethics. Our success can only be sustained by the highest standards of ethical and responsible behavior. These ethics stem from our values and permeate all of the company's processes.

2. Commitment to the sustainable development goals (sdgs) and global sustainability compacts. We are committed to supporting global sustainability initiatives and to helping achieve global social, environmental and economic goals. We have also made "health and wellness" and "gender equality" two key areas to work on, getting our team engaged through various awareness and social change actions.

Our global sustainability and esg policy defines the action plan in this area taking the material issues as guiding principles for our actions, focusing on social and governance as key priorities aligned with our raison d'être.

3. Independence and transparency. Independence and transparency are inalienable values for our company, which is why we will always act with impartiality, with independence of judgment that is not subject to any external pressure or particular interest.

We do not interfere or participate in political processes, and do not make direct or indirect contributions to political parties, organizations and associations, their representatives and candidates, or to media professionals.

We maintain the principle of political neutrality, and do not interfere politically in the communities we work in.

4. Listening to our stakeholders. We understand the perceptions, risks and opportunities that allow us to focus our strategies to improve satisfaction. Everyone in the group is committed to listening to our stakeholders in each of our areas of activity, so we can ensure that their needs are met.



5. Commitment to the community. The group contributes to society and the community by interacting with ngos, social entities and foundations to create a double positive impact at the local, national and global levels.

We take our role in society seriously, striving for its well-being. That is why, through our efforts and our economic capacity, we contribute to the development of our profession and the environments we work in.

Our contributions to support foundations and associations are consistent with our purpose and our sustainability policies. Our connection to the settings we work in is materialized through the lines of social action that we maintain to work with the most disadvantaged groups, in collaboration with social entities, ngos and foundations.

The sustainability and esg division will ensure that the donations are fully allocated to the chosen projects and have a direct impact on the organization's social work and, therefore, on the beneficiaries.

6. Intellectual and industrial property rights.

We are committed to respect for the intellectual and industrial property and rights of use of the company and third parties outside the group.

7. Respect for the environment.

Although our operations do not have a significant environmental impact, we are committed to preserving and respecting the environment. We operate under the following principles:

- Following best environmental practices in all our activities.
- Reducing any harmful effects that our business operations and the services we provide may have on the environment.
- Measuring our carbon footprint annually in all three scopes to keep track of our impact and continuously improve.

- Our employees are committed to reducing waste in accordance with the guidelines established in the various waste management procedures implemented in each country where the organization operates, which must be complied with by all employees.

- Special attention should be paid to management or storage of pollutants and waste, to ensure that no spillage occurs that could endanger the environment or human health.

- Digitalizing and promoting circular economy actions within our operations.

8. Responsibility to suppliers. Suppliers play an important role in the organization's strategy. For this reason, our relationships with them will be governed by ethical and professional criteria, and it is essential for employees to maintain relationships with supplier companies that benefit all the parties involved and that help create shared value.

9. Proper urban development and respect for biodiversity. We promote professional, upright, impartial and honest conduct in all our urban development and real estate activities.

Our commitment to correct urban development means that we prohibit unauthorized urban development, construction and construction work on land zoned for roads, green areas, public property and places that are legally or administratively recognized for their landscape, ecological, artistic, historical or cultural value, or that have been granted special protection for the same reasons.

10. Commitments to the market. The organization is committed to ensuring fair and just competition in the market. That is why it makes sure not to run comparative advertising or abuse dominant or privileged positions in the market.

# 4. Concrete manifestations of our commitments.

## 4.1. INTERNAL WHISTLEBLOWING CHANNEL.

The Group has set up an Internal Whistleblowing Channel for you. Any conduct that may be contrary to current legislation, and contrary to this Code of Ethics or the Organization's internal regulations must be reported through this channel. In particular, the following conduct should be reported:

- Acts that may be contrary to the Organization's regulations.
- Acts contrary to current legislation.
- Conduct that could constitute a serious or very serious administrative infraction.
- Acts that are suspected criminal offenses.
- Conduct related to labor law violations in law breaches in safety and health.
- Violations of EU law.
- The whistleblowing channel will be accessible through the various websites of the companies in the Group.

The Organization's Compliance Committee will monitor compliance with this Code and the internal policies and procedures.

Anyone subject to this Code of Ethics who becomes aware, or has reasonable indications, of illegal actions or actions contrary to with this Code, must

inform the Compliance Committee through the Whistleblowing Channel, and may bring the facts to the attention of their hierarchical superior if they consider doing so appropriate.

Likewise, those bound by this Code of Ethics may not, regardless of their position or hierarchical position, request, require or order actions contrary to this Code.

All persons must report and communicate any possible risks or breaches of the Code of Ethics, or of any other of the above regulations.

No disciplinary action or direct or indirect retaliation of any kind may be taken for report suspicious facts through the Internal Whistleblowing Channel, provided that the report is bona fide.

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