



ASEPEYO

Asepeyo Code of Conduct



Asepeyo Mutual Insurance Company working with the Social Security No. 151 is a business owners' association mainly aimed at non-profit collaboration with Social Security procedures by processing benefits and providing prevention activities as legally attributed.

Pursuant to its vocation for excellence and leadership in the sector, Asepeyo is highly self-demanding in its actions, which are governed by the principles of quality, a constant will to improve, scrupulous respect for people's rights and efficient management of resources and benefits.

Asepeyo commits to acting at all times in accordance with the laws in effect and engaging in ethical and professional behaviour pursuant to the mutual insurance company's values. The Asepeyo Board has approved this Code of Conduct with a desire to deepen its commitment to the ethical management of the mutual insurance company in its internal and external relations.

I. Scope of the Code of Conduct

1. The provisions of this Code of Conduct are binding for all of the mutual insurance company's staff and management personnel which must apply it and, when necessary, develop its benefits in coherence with the mutual insurance company philosophy.
2. The rights and obligations recognized in this Code are part of the mutual insurance company staff and management personnel's labour relationship.
3. For the purposes of the provisions of this Code of Conduct, mutual insurance company management personnel shall mean: within the territorial scope, all healthcare centre management to territorial management; within hospitals, the head of administration, facility management, nursing management, medical management and the general manager; and within a functional scope, the functional area management to functional management; and within general management, senior management; also included in this list are all deputy and assistant managers and other similar positions.

4. The principles of this code of conduct shall also apply to the members of the mutual insurance company's governing and policyholder bodies as well as the mutual insurance company's suppliers pursuant to the terms of their contracts.

II. Asepeyo Values

1. The mutual insurance company's values, which are reflected in its vision and mission document, are as follows:
 - a. A vocation for service
Striving to meet the highest standards of quality in customer experience with absolute priority for injured or ill workers.
 - b. People orientation
Promoting relations based on trust, mutual respect and active listening.
 - c. Efficient management
Managing resources wisely with sustainability and transparency criteria.
 - d. A positive social contribution
Contributing value to society, especially with respect to groups in situations of need and encouraging the implementation of best environmental practices.
 - e. Integrity and legality
Acting with humanity, ethics and honesty, always complying with the law.
 - f. Innovation
Boosting innovation to meet real needs, constantly enhancing services, facilities and equipment.
 - g. Teamwork
Working for the integration of each of our professionals in the company's general strategy, encouraging collaborative work between teams and departments.



III. Resource Management and Asepeyo's Commitment to Society

Responsible Resource Management

6. At all times, Asepeyo will engage in responsible and efficient management of the resources entrusted to it so as to guarantee the mutual insurance company's economic solvency, avoid harm to its associated companies, quickly process the benefits it manages and ensure due quality in the services it must provide to those it protects.

Abidance by the Law, Respect for People's Rights and the Rejection of Discrimination

7. Asepeyo shall adjust its behaviour to any applicable rules with scrupulous respect for people's rights and preventing any type of discrimination on the basis of birth, race, sex, religion, opinion or any other personal or social condition or circumstance.

Institutional Collaboration

8. Asepeyo undertakes to collaborate with Public Administrations and, in particular, with the mutual insurance company supervisory authority, the General Social Security Administration, the Court of Auditors, the Social Security management entities and the General Social Security Treasury as well as healthcare authorities.
9. Asepeyo further commits to collaborating with all stakeholders involved in Occupational Safety and Health in accordance with the law.

Veracity and Advertising

10. Asepeyo will always provide true and exact information. The principle of advertising, among others, will accompany the mutual insurance company's actions with the utmost respect for the laws in force.

Political Neutrality

11. Asepeyo maintains the principle of political neutrality. It will not make any contributions or donations to any political party or individual politicians or unions or any associations or foundations that may be promoted by them.

Personal Data Protection

12. Asepeyo will fulfill all of its obligations deriving from personal data protection regulations, maintain due secrecy of personal data, implement the necessary technical and organizational security measures at all times and establish a procedure to guarantee the exercise of rights of information, access, rectification, objection, erasure, restriction of processing and portability.

Occupational Safety and Health

13. Asepeyo will establish adequate working conditions to guarantee its staff's safety and health.
14. Asepeyo will conduct risk assessment and prevention planning and will handle all occupational safety and health information and training pursuant to the laws in effect.

Environmental Commitment

15. Asepeyo supports environmental prevention and protection in all aspects.
16. Through an environmental management system, Asepeyo will identify and evaluate environmental issues resulting from its activities, evaluate compliance with applicable environmental requirements, establish and ensure the achievement of environmental goals, verify waste management operations are properly performed, promote the sustainable use of natural resources and implement corrective and preventive actions.

IV. Conflicts of Interest and Personal Benefits

Conflicts of Interest

17. Asepeyo personnel will prevent any situation that may cause conflict between its responsibilities as an employer and personal interests, especially of those participating in contractor, supplier and external collaborator selection processes.
18. Asepeyo's interests shall prevail over third-party interests and over any private interests in



all actions undertaken in relation to labour relations.

19. To avoid conflicts of interest, Asepeyo personnel may not participate in procedures and/or negotiations with mutual benefit societies, suppliers or the mutual insurance company's collaborators when they or their spouse, a family member to the second degree of kinship or affinity, whether members or participants, are on the governing bodies or members of the management.
20. To further avoid conflicts of interest, Asepeyo management personnel are prohibited from being Asepeyo suppliers or external collaborators or holding member or participant status either directly or through third parties in Asepeyo suppliers or external collaborators.
21. The following are exceptions to the foregoing prohibitions:
 - a. The ownership of shares in companies listed on the Spanish continuous trading market or similar markets in other countries which have been acquired through open market transactions whenever such ownership does not involve participation on governing and/or management bodies and in decision making other than attendance and voting rights which may be exercised at General Meetings of Shareholders.
 - b. Actions of representation of the mutual insurance company or undertaken in view of a mutual insurance company mandate pursuant in any case to the laws in force at the time.
 - c. Membership in associations, sports entities, non-profit organizations, foundations and similar groups whether holding any type of paid office or not. If any of these organizations are Asepeyo policyholders or suppliers, the employee affected shall communicate such circumstance in writing to the Compliance Committee and refrain from participating in negotiations between the mutual

insurance company and the institution of which they are a member.

Other Professional Activities

22. Asepeyo management personnel may not engage in any other professional activities themselves or through substitution which are incompatible with their management office and/or area of responsibility.
23. If engaging in any professional activities other than the provision of services for Asepeyo is allowed by the mutual insurance company's labour conditions, they may be performed when:
 - a. There is no shortage in the expected efficacy of the performance of duties for the mutual insurance company.
 - b. They do not restrict the flexibility or time availability inherent to the duties assigned within the mutual insurance company.

Personal Benefits

24. Asepeyo personnel shall not accept any economic compensation, gifts or favours or any invitations to events not related to their jobs.
25. Courtesy gifts of symbolic value and/or very little monetary value are the only exclusion to this rule, pursuant to social customs.

Information Obligation

26. Asepeyo personnel must inform the Compliance Committee of any personal or professional situation that affects them and that may be incompatible with the provisions of this section IV of the Code of Conduct. If there are any doubts, said Committee shall also be consulted.

Commitment against conflicts of interest and engaging in incompatible professional activities

27. The commitments against conflicts of interest and engaging in incompatible professional activities are essential parts of the relationship



of trust sustaining the offices held by management personnel.

28. Asepeyo management personnel will sign a statement declaring they do not have any conflicts of interest and do not engage in any incompatible professional activities, undertaking to remain free of any conflicts of interest and not engage in any incompatible professional activities under the terms established in the model sworn statement attached to this Code which is an integral part thereof for all purposes. This shall be a preliminary and mandatory requirement for all new appointments prior to confirmation.
29. Individual sworn statements against conflicts of interest and engaging in incompatible professional activities shall be sent to the Human Resources Department and will be included in each employment file.

V. Labour Relations

Non-Discrimination, Equal Treatment and the Prohibition of Workplace Harassment

30. Asepeyo does not tolerate any form of harassment or physical, sexual, psychological or verbal abuse or discrimination on the basis of birth, race, sex, religion, opinion or any other personal or social condition or circumstance. The mutual insurance company will promote policies of equal treatment and will act in a corrective manner in view of situations of harassment or those contrary to the rights of its personnel.

Recruitment and Contracting

31. The recruitment and contracting of personnel shall meet target criteria and be fixed by the mutual insurance company's management. In any case, Asepeyo will promote stable job market contracting.

Compensation

32. All compensation will meet the requirements of fair criteria based on levels of responsibility, education, attitude, availability, dedication and

contributions to quality and the goals established by the mutual insurance company.

Dedication

33. Asepeyo personnel are required to complete their full workdays and at the times established, not be absent from their job except in situations provided for by law or a collective agreement or secure due authorization from a hierarchical superior and perform their work with professionalism, diligence, good faith and in accordance with any instructions given by Asepeyo. They will not participate in personal activities during working hours.

Professional Development

34. Asepeyo believes its personnel are the basic cornerstone of its competitiveness. Therefore, it is committed to promoting active human resources policies aimed at developing their potential. Among others, these include job descriptions and their competence-based profiles, education as a development tool and performance evaluations.

Management Powers

35. Asepeyo requires people in positions of management responsibility reasonably and humanely use their organizational and disciplinary authority, ensuring those supervised understand their responsibilities in accordance with this Code and the company's other policies. Likewise, they agree not to encourage or order the achievement of results at the expense of conduct that is contrary to the mutual insurance company's ethics or that would violate this Code of Conduct or the regulations in effect.

Career Plans

36. Asepeyo will promote the development of its personnel's skills and their promotion through career plans designed as per objective criteria of merit and capability.



Performance Management

37. Job performance shall be reviewed and analyzed based on the corporate performance management model.

Training

38. Asepeyo will provide personnel with the necessary training tools to understand the general aspects of the mutual insurance company and its collaboration with Social Security procedures management and will promote the maintenance of a policy that allows each person the opportunity to develop on the job, enhance their professional and human skills and guide their work towards their career goals. The mutual insurance company's internal training will be designed and managed in accordance with the foregoing principles through the Asepeyo Corporate University.
39. All personnel are required to take advantage of the training activities they participate in.

Work/Life Balance

40. Asepeyo will strive for a work/life balance for its staff.

Integration of Functionally Diverse People

41. Asepeyo will encourage the job integration of people of functional diversity by eliminating all types of barriers within the company for their insertion.
42. Asepeyo guarantees compliance with regulations on the job integration of people of functional diversity and promotes this compliance through its suppliers and other stakeholders.

Conduct at Work

43. Asepeyo personnel shall engage in dignified conduct on the job, maintain due respect for all colleagues and abide by all internal policies on working with third parties. This conduct shall be reflected in any activities related to the company outside working hours and/or on social media, blogs, wikis, etc.

44. Asepeyo personnel are required to respect all occupational safety and health internal policies and instructions.

45. The consumption of alcohol or drugs on the job and reporting to work drunk or under the influence of narcotic substances is absolutely prohibited. Asepeyo strictly complies with regulations prohibiting smoking in healthcare centres and offices.

Payments, Gifts and Compensation for Third Parties

46. Asepeyo personnel may not in the performance of their work directly or indirectly offer promises, payments, gifts or compensation of any kind in an attempt to improperly influence third parties.

Use of Corporate Property

47. Asepeyo personnel will use all company assets made available to them exclusively for the purposes for which they are delivered and will care for them, report any imperfections or failures that may arise and return them when asked to do so. They will also not use any such assets for their own personal benefit or the benefit of any other person outside the mutual insurance company.

48. Furthermore, they will ensure rational and responsible consumption of all resources used in the performance of their work.

Confidentiality and Data Protection

49. All personnel will maintain confidentiality and never use any Asepeyo information available or that may be accessed in relation to knowledge of the entity or sector or in relation to other mutual insurance societies, covered self-employed workers or protected workers improperly or without Asepeyo consent.

50. Asepeyo personnel will comply with the obligations deriving from personal data protection regulations as well as manuals, circulars and, in general, any internal policy relating to personal data protection and information security.



51. Any Asepeyo personnel who in the performance of their work gain access to health data will be required to keep such data secret under the terms of applicable regulations.

Political Neutrality

52. Asepeyo personnel shall observe the principle of political neutrality in the performance of their work and never offer any type of political position in any public declarations or statements to third parties that may be made in representation of the entity.

Environmental Commitment

53. Asepeyo personnel must be actively and responsibly committed to preserving the environment and will, therefore, comply with the provisions of the Asepeyo environmental policy and will act with the utmost diligence to correct any incident that may harm the environment.

VI. Supplier Relations

54. All Asepeyo contracts with external suppliers shall be subject to applicable regulations as well as the entity's internal policies in line with the following aims:
- Whenever possible, encouraging competition among several suppliers of goods and services that meet the needs and requirements established by the entity as concerns the characteristics and conditions offered.
 - Selecting the offer that is most beneficial to the entity.
 - Guaranteeing equal treatment and non-discrimination of candidates as well as objectiveness and transparency in decision-making processes.
55. Only authorized personnel may formalize contracts and order on behalf of the mutual insurance company.
56. Asepeyo shall maintain a relationship of trust, veracity and ethical principles with its suppliers.

Likewise, it shall make payments within the agreed periods.

VII. Relations with Associated Companies, Covered Self-Employed Workers and External Collaborators

57. Asepeyo will ensure compliance with associated company and protected parties' rights and obligations and will fulfill its own obligations towards them.
58. Asepeyo customer orientation is reflected in its vocation for excellence in service based on:
- An ongoing understanding, concern and investigation of their needs and the satisfaction attained with the services provided.
 - Communication and clear and transparent information to provide them with knowledge and the use of our services.
 - Direct contact, either personally or through digital resources, putting all Asepeyo resources a their service to advise them on their needs and offer solutions, always within the limits of the powers attributed to the mutual insurance company.
 - Ongoing improvement of Asepeyo services and actions, guiding all work towards value creation.
 - Adequate management of suggestions, claims and complaints from mutual benefit societies and external collaborators must be a tool for improving service quality and objectively assessing all actions taken.

VII. Protected Workers

Quality of Care and Medical Resources

59. Asepeyo will provide the most complete healthcare to protected parties, always striving for the greatest possible benefit and limiting risks and harm to the extent possible.
60. Asepeyo is committed to quality and excellence in its care resources internally and externally and in healthcare research and



development as an instrumental way to achieve the foregoing goals.

61. All external care resources used by Asepeyo must comply with the quality standards established by the entity and fulfill the legal requirements for providing care to protected workers.
62. The vocation for quality and excellence in Asepeyo care services is reflected in the will for territorial proximity between the organization and patients and specialized care, when necessary, to enable close, flexible and qualified healthcare.
63. Asepeyo will ensure compliance with patient and user rights and obligations and will fulfill its own obligations towards them.

Humane Treatment

64. Asepeyo service must be characterized by respectful and humane treatment for all workers protected by the mutual insurance company.

Equative Access and Impartiality

65. Asepeyo undertakes to ensure equative access to all benefits, services and care resources for all protected parties and to be objective and impartial in the assigned management of benefits.

Information

66. Asepeyo will provide protected parties with as much information as may be relevant or may be requested in relation to its care process and the receipt of benefits.

Clinical Records

67. Asepeyo undertakes to maintain patient clinical records with all the guarantees established by law and adopt adequate technical and organizational measures to protect them, prevent the destruction or accidental loss thereof and guarantee their confidentiality.

68. The right to access and copy patient clinical record documentation may be exercised through the procedure established by the entity.

Special Benefits

69. Through the Special Benefits Committee and subject to the regulations in effect at any given time, Asepeyo will make its best efforts to respond to situations of special need among protected parties. These special benefits shall be processed in consideration of each worker's individual personal and family circumstances. Those who have suffered a workplace accident or occupational disease shall be given proper information on all social benefits of interest.

Claims, Complaints and Suggestions

70. Asepeyo will process all claims and complaints from protected workers and submit all actions taken to review, offering grounded responses. Under no circumstance may any party filing a claim be harmed due to exercising their right to a claim. Likewise, all suggestions received will be taken into consideration as a way to improve services.

IX. Governing, Participatory and Consultation Bodies

71. Good governance and operation at Asepeyo will be governed by the provisions of the Mutual Insurance Company Statutes and any legal and regulatory provisions applicable.
72. Asepeyo will publicly announce all calls for General Meetings.
73. Asepeyo will public announce and disseminate the annual results of its activities, always in compliance with applicable regulations.
74. Asepeyo will ensure the participation of business organizations, unions and self-employment associations within the entity through participatory bodies and periodic reporting to them on the assigned collaboration with the management of Social Security benefits.



75. Asepeyo will also facilitate participation and consultation by mutual benefit societies through the bodies established by the statutes for this purpose.

X. Actions Towards Third Parties and Competition

76. Asepeyo endorses and complies with the ban on recruiting associated companies or covered workers as well as the ban on granting benefits to associated companies and substitutions in its obligations, subject to the instructions issued by the mutual insurance company supervisory body.
77. Asepeyo will not try to improperly influence any third parties.
78. Asepeyo undertakes to perform its Social Security benefit management collaboration duties subject to all applicable regulations at any given time.
79. Asepeyo will act in concurrence and loyal collaboration with all other mutual insurance companies in the fulfillment of its assigned duties and any duties of interest to the mutual insurance sector and will contribute to its development by actively participating in the research and improvement of services and benefits.
80. Asepeyo confirms its will to the integration and leadership of all mutual insurance companies working with the Social Security by actively collaborating and stimulating other mutual insurance companies to engage in more efficient management.
81. Asepeyo shall maintain a relationship of trust, veracity and ethical principles in its collaboration agreements with other mutual insurance companies, associations, organizations, professional groups, universities and other entities.

XI. Accounting and Finances

82. Asepeyo will keep proper accounting records subject to the public accounting standards for

mutual insurance companies working with the Social Security.

83. All payments by Asepeyo will be made by bank transfer except those which cannot be made through this payment method.
84. Financial investments to be made by Asepeyo will comply with the provisions of all applicable regulations and will be managed in a centralized manner subject to criteria of profitability, security and liquidity.
85. Payments will be ordered by the corresponding competent party and any payments other than benefits payable by Asepeyo will be subject to the submission of the corresponding invoice or security giving rise to the payment obligation as well as any supporting documentation.

XII. Code of Conduct Compliance and Changes

General Obligations

86. Asepeyo staff and management personnel are required to comply with the provisions of this Internal Code of Conduct.
87. Management personnel are responsible for communicating the content and aims thereof to their respective organizations and requiring all personnel avoid behaviours that may be conflictive with these principles.

Compliance Committee

88. The Compliance Committee has the following powers:
- To adopt binding decisions of any kind in relation to facts or conducts that are contrary to the provisions of this Code of Conduct.
 - Resolve any queries or interpretative doubts that may arise in relation to the provisions of this Code of Conduct.
 - Propose modifications and updates necessary in relation to the provisions of this Code of Conduct.



89. It is comprised of the following people:

- a. Deputy Managing Director
Director of Human Resources
Director of Legal Affairs
Director of Contracts
Director of Cybersecurity and ICT Risks

90. Through the Managing Director, the Compliance Committee will periodically report its activities to the Asepeyo Governing Board.

91. All Compliance Committee deliberations shall be kept secret. Minutes of all meetings, including the decisions taken, will be issued.

92. The people on the Compliance Committee will maintain due confidentiality in relation to all information they gain knowledge of as part of their duties with said body.

93. When a person who is on the Compliance Committee may be affected by a situation of conflict of interests, incompatibility or, in general, any breach of the provisions of this Code, that person shall abstain from participating in the Committee deliberations and votes that may affect them.

XIII. Procedure for Ensuring Compliance with the Code of Conduct

94. Asepeyo personnel must inform the Compliance Committee, through the COMPLIANCE COMMITTEE management, of any conduct or process that is in good faith considered contrary to the provisions of this Code of Conduct.

95. Suppliers, the entity's external collaborators and, in general, any third parties that may be affected by the provisions of this Code may also inform the Compliance Committee of any of the foregoing situations via the Customer Service contact form on the entity's website.

96. The identity of the people who communicate with the Compliance Committee will be confidential. No anonymous communication will be allowed.

97. The Compliance Committee will appoint an investigator from among its members to collect the necessary information to understand the facts and may approach functional and territorial divisions to do so as well as hospital management staff, all of whom must offer their collaboration. The investigator will submit a proposed decision to the Compliance Committee.

98. Those who collaborate or intervene in the investigation of facts or conducts that may be contrary to the provisions of this Code are required to maintain due confidentiality.

99. The corresponding competent management personnel in each case will be responsible for adopting the corrective measures necessary and human resources management will have the authority to take disciplinary action against violations of this Code of Conduct.

100. No type of discrimination or retaliation against mutual insurance company personnel or third parties that may have offered information in good faith on alleged violations will be allowed.

Entry into Force and Changes

101. This Code of Conduct shall enter into force on the date of its publication.

102. The provisions of this Code of Conduct may only be modified through a resolution by the Governing Board.



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MUTUAL INSURANCE COMPANY WORKING
WITH THE SOCIAL SECURITY NO. 151