

Standard Operating Procedure

Document		
Code	SOP EV-G-11-001 EN	
Title	Code of conduct - Evidenze Group	
Prepared and approved		
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TRAINING PERIOD:

From: 26/07/2022

To: 21/09/2022

EFFECTIVE DATE: 22/09/2022

RELEVANT NOTE: Due to the integration of the Quality System and considering the number of SOPs that need to be updated and the holidays period, the training period is exceptionally extended up to 22/09/2022.

For the following updates of this SOP, the training period will be the one indicated in the SOP EV-QA-01 EN *SOP and SOG management*.

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1. SCOPE

The scope of this procedure is mandatory for all Evidenze Group employees.

This Code of Conduct is a tool to help assess the behaviours and/or actions carried out by employees during and outside of their working hours that could directly or indirectly damage or strengthen the company's image.

2. OBJECTIVE

To establish good conduct practices that should prevail in all relationships carried out by Evidenze Group personnel in actions carried out on behalf of the company, as well in the interactions with third parties in person, online or using social networks.

This document is divided into the following sections:

Section I: General ethical principles.

Section II: Good practices in the processing of personal data during business relationships and third parties.

Section III: Good hiring practices and managing personnel.

Section IV: Assess in the evaluation of ethical compliance with this Code of Conduct.

3. DOCUMENTS /GLOSSARY/DEFINITIONS

3.1. RELATED DOCUMENTS

- Code of conduct. European Medicines Agency (EMA)
- European Medicines Agency policy on the handling of competing interests of scientific committees' members and experts. EMA/MB/89351/2020
- Code of Good Practice for the Pharmaceutical Industry by Farmaindustria (Spain)
- Code of Good Practice by Spanish Federation of Healthcare Technology Companies
- Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital right
- Regulation (UE) 2016/679 of the European Parliament and of the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data
- SOPs of Evidenze and its subsidiary companies

3.2. GLOSSARY

QAD	Quality Assurance Director
SOG	Standard Operating Guideline
SOP	Standard Operating Procedure

3.3. DEFINITIONS

- **Company staff:** All employees hired by Evidenze Group and its subsidiaries companies regardless of the role or the functions performed as part of their job.
- **Third parties or external parties:** Any natural person or legal entity that is related to the company through our employees.
- **Code of Conduct or Ethic Code:** Referred to the document that defines the ethical guidelines that shall be followed by all employees according to values and work philosophy of Evidenze Group.

4. ANNEX INDEX

N/A

5. PROCEDURE

MATRIX OF RESPONSIBILITIES

The matrix of responsibilities does not apply since the compliance with this document is mandatory for all company employees without exceptions for Departments, hierarchical level or role in the company.

5.1. SECTION I: GENERAL ETHICAL PRINCIPLES

Evidenze Group defines all its work and business relationships through a strict Code of Conduct based on our values. It is necessary to develop these values by employees in each daily activity.

5.1.1. ¿WHAT IS EVIDENZE GROUP?

Evidenze Group is an international services company providing solutions for the management of knowledge in health, specialized in Clinical Research, Medical Education, Communication and Patient Support Programs.

MISSION

The mission of Evidenze Group is to add value to health sector improving clinical practice through evidence generation.

VISION

To be recognized as a reference company in the management of knowledge in health for our understanding of the needs of the sector and for our integration of services aimed at improving people's quality of life.

VALUES

A. INTEGRITY

- We always operate within the international and local regulations of the sector
- We operate with ethical principles to our employees, clients, suppliers and society
- We try to always do the right thing with openness and honesty
- We act responsibly and transparently in fulfilling our commitments
- **Associated behaviours:** Leadership and respect.

B. TEAM

- All members of the Evidenze Group share common goals
- We are interdependent and aware that success depends not only on compliance with individuals' responsibilities of each one but of the support to the rest of the team
- **Associated behaviours:** Leadership, respect, commitment, collaboration, constructive attitude and communication.

C. TRUST

- We respect our co-workers, customers and suppliers and treat them as we want to be treated
- We trust in the abilities and intentions of others and we are aware that all they can perform better in an environment of trust
- We recognize that different work styles can add value, be complementary and improve the results of the team and the company
- **Associated behaviours:** Respect, commitment, collaboration, constructive attitude and communication.

D. QUALITY

- We act with high quality and safety standards in all our tasks and activities
- We are aware that our credibility and the trust of our clients depends on quality of our services and their delivery in agreed times
- **Associated behaviours:** Commitment, collaboration, compliance, customer orientation, operational discipline.

E. INNOVATION

- We bring new ideas and technological value to simplify and improve research processes, training and patient support programs
- We focus on thoroughly understanding our clients, the regulatory and technological framework searching for innovative solutions that add value in a constantly evolving environment

- **Associated behaviours:** Leadership, communication, customer orientation, initiative, creativity.

5.1.2. DEFINITIONS RELATED TO BEHAVIOURS ASSOCIATED TO THE COMPANY VALUES

- **Leadership:** To have a vision of what is achievable, transmit it effectively, commit others to it, put the means so that it can be carried out and ensure its fulfilment.
- **Respect:** To treat others as we would like to be treated, do not put our own interests before others. Follow and comply with the rules.
- **Commitment:** To feel the company and team interests as their own and chase its fulfilment. Dissatisfaction about goals that has not been achieved.
- **Collaboration:** To contribute to achieve common goals and help others in individual or team tasks.
- **Constructive attitude:** To think about possibilities and alternatives to achieve goals or overcome obstacles, not only in problems or limitations. To try thinking in “how to” instead of “Why not to”.
- **Effective communication:** Bi-directional communication. Receiver: listen before reacting/letting speak. Speaker: adapt communication to audience and context; prepare communication; conciseness.
- **Compliance:** To honor the expectations created and respond satisfactorily to the objectives. It is the key to generating and maintaining internal and external trust.
- **Confidentiality:** To be aware about confidential, sensitive (official or unofficial) information and keep it secretly. If there is a doubt, consult the General Director.
- **Customer orientation:** Our success depends on the deep knowledge of our clients (objectives, strategies, lines of business, organization, key personnel, decision-making process and competence).
- **Operational discipline:** Solid work processes and good planning to successfully achieve the team’s tasks towards our client’s satisfaction
- **Initiative:** To be alert to opportunities in clients, in the market or in company, to suggest changes or actions instead of waiting for others to do.
- **Creativity:** To think about beyond the standard, or what is usual. However, it is important to seek a balance between creative ideas and what is realistic/executable/efficient/enforced. However, sometimes is necessary to try things taking reasonable risks.

DEFINITIONS	WHO IS INVOLVED
Leadership	All employees. Team leaders
Respect	All employees
Commitment	All employees
Collaboration	All employees
Constructive attitude	All employees
Effective communication	All employees. Team leaders. Commercial-Develop
Compliance	All employees. Team leaders. Commercial. Production
Confidentiality	All employees. Team leaders
Customer orientation	All employees

Operational discipline	All employees. Team leaders. Commercial. Production
Initiative	All employees. Team leaders. Commercial-Develop
Creativity	All employees. Business Develop. Commercial

5.1.3. RELIGIOUS, POLITICAL, SEXUAL ORIENTATION, GENDER EQUALITY AND OTHERS

- Evidenze Group guarantees all its employees respect for their human and civil rights, which means that they are totally free to express their political, religious, social or any other opinions. This corporate commitment includes: to ensure the right of association to all people who are part of our company, as long as they do not suppose a risk to its image, or conflict with the ethical principles described in this Code of Conduct or current legislation.
- It is totally forbidden to establish any political or religious position in the name or on behalf of the company.
- The company guarantees that the same principles of remuneration and professional evaluation are followed for all employees, regardless of their gender but based on their experience and training.
- We value the cultural diversity of our company and guarantee the non-discrimination of any employee or external third parties. This obligation also applies in those cases in which employees, in the exercise of their personal freedom outside of their working hours, may be involved in aggressions and/or situations of violence or discrimination that may or may not be publicly disclosed on social networks or equivalent, or that the Chief Executive Manager is informed by some internal or external means.

5.1.4. WORKPLACE HARASSMENT IN ANY OF ITS EXPRESSIONS (BULLYNG, SEXUAL HARASSMENT, AND EQUIVALENTS)

- It is **totally forbidden** to exercise any type of psychological, verbal, sexual or physical violence, workplace harassment, bullying or any other kind of situation that may be understood by the affected person as an action that violates the rights or freedom of his/her person or his/her integrity, or physical, moral or mental health.
- In the event that an employee considers that he/she is being victim of a situation of this type, or is a witness to it, the employee shall immediately notify the General Management of the company in order to take the necessary measures as the case. The privacy and confidentiality of complaints will always be guaranteed.
- We are committed to creating a healthy and pleasant work environment for all our employees; therefore, we actively watch over to listen to the needs of the staff and attend to them as appropriate with the relevance that are possible according to the case.
- If you find yourself in a situation of discomfort for any reason (facilities, resources, relationship with your colleagues, etc.), go directly to your direct manager, who will manage the situation so that the discomfort is resolved as soon as possible. If you prefer, you can send your complaint through the email comunica@evidenze.com. Confidentiality will be guaranteed in all cases.
- We always follow the regulations related to the prevention occupational risks and we put the technical and human resources to ensure compliance.

5.1.5. ANTI-SLAVERY AND HUMAN TRAFFICK POLICY

- Modern slavery is a crime and a violation of fundamental human rights. This manifests itself in various forms, such as: slavery, servitude, forced and compulsory labour, and human trafficking. They all have in common deprivation of liberty of one person by another, for exploitation purpose of to economic gain.
- Evidenze Group does **no tolerance** to any form of modern slavery. And we are committed to acting with ethics and integrity in all our business and work agreements and relationships; as well as to implement effective systems and controls to ensure that any form of modern slavery is not part of our company's business practices, neither any aspect of internal and/or production processes.
- We are committed to ensuring the transparency of our company and the way we approach the modern slavery in relationships with our suppliers according to current applicable regulations. Therefore, we expect the same standards from our suppliers, customers and other partners who are involved in business generation processes.
- We specifically include prohibitions against the use of forced, compulsory or trafficked labour, or any person held in slavery or servitude, whether they are adults or children, and we expect our suppliers to hold their own suppliers to the same high standards and good practices.

5.2. SECTION II: GOOD PRACTICES IN PROCESSING OF PERSONAL DATA DURING BUSINESS RELATIONSHIPS AND THIRD PARTIES

- Evidenze Group guarantees compliance with the European General Data Protection Regulation.
- Evidenze Group identifies a Data Protection Officer, responsible for managing all incidents, doubts or possible breaches in terms of data protection.
- Evidenze Group is committed to protecting the rights of all parties involved. These rights are described below:
 - o Right to request **Access** to personal data managed by Evidenze Group.
 - o Right to request **Rectification** or deletion.
 - o Right to request **Cancellation**.
 - o Right to **Oppose** the planned treatment, except in those cases indicated in the Law for research purposes.
 - o Right to request **Limitation** of the processing of personal data, except in those cases indicated in the Law for research purposes.
 - o Right to data **Portability**.
 - o Right to be **Forgotten**, except in those cases indicated in the Law for research purposes.
- The company will facilitate all the procedures related to carry out these rights to employees, as well as to third parties (investigators, patients, clients, subscribers to the newsletter, etc.).
- Any person who wants to carry out any action on their personal data, may send an email to the account: comunica@evidenze.com, or by sending a letter to the next address: 8-10 Josep Tarradellas Avenue, 5th floor, door 4, Barcelona, Spain 08029, recipient: DPO – Evidenze Group.

- All company employees who detect behaviour contrary to compliance with current legislation on data protection, shall immediately notify the Data Protection Officer. In these cases, the DPO shall act without delay in order to guarantee security and restoration of their protection in the event that it has been violated. No employee may be sanctioned as a result of the notification of an involuntary breach of their own or of other workers in terms of data protection.
- In all cases, only those personal data essential to carry out the corresponding tasks will be requested from third parties. This information will be eliminated according to provisions of current legislation once the tasks are completed.
- All company employees shall receive regular training on data protection. This training will be documented in the Quality System.

5.3. SECTION III: GOOD HIRING PRACTICES AND MANAGING PERSONNEL

All Evidenze Group employees involved in the process of hiring and/or personnel management shall follow the principles described below:

- The selection of candidates shall always be made based on criteria related to the prior demonstration of their qualification, training, skills and adequate competencies to occupy the position and role for which they have been chosen. This shall be proven by CV and interviews with people responsible for their hiring.
- Candidates cannot be excluded from the selection process by reasons of race, sex, age, religion, political opinions, sexual orientation or any other criteria that it not strictly linked to the performance and functions of the position which they are opting.
- The company guarantees equal treatment in terms of the requirements to the job position to all candidates who are participating in a selection process. To ensure compliance with this principle, it is mandatory a job description according to the position offered prior to their publication.
- The hiring of children or adolescents is forbidden.

5.4. SECTION IV: ASSESS IN THE EVALUATION OF ETHICAL COMPLIANCE WITH THIS CODE OF CONDUCT

It is possible that throughout the employee stay at Evidenze Group, they will find situations that may create doubts about whether they represent a breach of this Code of Conduct; therefore, below are a serie of questions that can help the employees to identify whether to report a possible violation of this Code:

- *Is the action and/or conduct that you are evaluating legal, or may it raise doubts about it?*
- *Would I have any inconvenience if there is a press publication associated with my own name to the situation that is being evaluated?*
- *Does the action and/or conduct you are evaluating, reflect the values and Code of Conduct of the company?*

- *If the action and/or conduct that you are evaluating become viral on social media, could it suppose a problem for your present or future professional career and relationships with family and friends?*
- *Would my family and friends agree that my conduct or decision was in line with ethics?*
- *Could I overtly comment with my direct superior the action and/or conduct that I am evaluating?*
- *Does the action and/or conduct that you are evaluating harm the company or a colleague in any way?*
- *Would I like others to treat me that way?*
- *May my feelings and subjectivity affect my judgment, decision or opinion regarding the situation/action or behaviour that is being evaluated?*
- *Does the action and/or conduct you are evaluating violate any Policy, SOP, SOG or any other internal regulations of Evidenze Group?*

If the answer to one or more of these questions above involves an ethical, moral, family, personal or professional conflict, you shall consider that the situation/action and/or conduct you are analysing violates this Code of Conduct and therefore you shall report it through the channels specified in this document.

5.4.1. COMPLAINTS CHANNEL AND CONSEQUENCES ABOUT BREACH OF THIS CODE OF CONDUCT

Whenever you find yourself in the presence of a violation of this procedure or doubt whether it is, contact your direct manager immediately.

If you cannot contact your direct manager due to the nature of the breach, you could contact the Chief Executive Officer, who will assist you and guarantee confidentiality and anonymity if you wish.

You could also send your complaint to the email comunica@evidenze.com. In all cases, the confidentiality provided for information will be protected.

Employees who proactively report violations of this procedure, may not be subject to disciplinary action regardless of the result of the internal investigation that arises as a result of the report, except in those cases that result uncivil or criminal liabilities and shall be brought to the attention of the competent authority.

The consequences of non-compliance for this SOP are described below:

- Internal sanctions such as loss of benefits due to the nature of the denounced event
- Expire of job contract
- Civil and/or criminal responsibilities

Employees who are aware of breaches of this SOP and do not report it in a timely manner, may be subject to disciplinary sanctions. **The safeguarding of a suitable work environment is responsibility of all.**

5.5. FORMS

Refer to the forms linked to this SOP in the updated list of Qualios by entering username and password. These forms will be referenced with the code: F-EV-G-11.

6. ANNEXES

N/A

7. VERSION CONTROL

Note to history: Revision control is performed in Qualios System directly. To see changes control, enter Qualios with the username and password.