



**ETHICAL SCIENCE FOR HEALTH**

# **Grifols' Guide to Ethics**

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**GRIFOLS**

**WORKING FOR HEALTH**



# ETHICAL SCIENCE FOR HEALTH

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Scientia et Ethica Pro Salute  
Ethical Science for Health

Grifols' Guide to Ethics

**GRIFOLS IS COMMITTED TO ETHICS AND INTEGRITY**

Grifols Inc. and its affiliates (collectively “Grifols” or “Company”) are dedicated to conducting business in accordance with the highest ethical and legal standards. Our reputation for quality, integrity, respect, and honesty in all activities has been the foundation for our success and is one of our most valuable assets. As an employee of Grifols, you share the responsibility and privilege of upholding Grifols’ reputation of honor and ethical behavior. You accomplish this by always acting legally and ethically, or in other words, by always making the right decision and by doing the right thing.

Grifols recognizes that situations may arise where making the right choice or doing the right thing can be challenging. For that reason, we have already provided you with Grifols’ Code of Ethics which identifies the vision and core values that form the basis of Grifols’ culture. We now present to you this document, “*Grifols’ Guide to Ethics*”. This “Guide to Ethics” or “Guide” discusses a wide range of business practices, applicable laws and Company policies and/or procedures. It does not cover all the details or all applicable laws, regulations and policies that govern Grifols. Nor does it replace your responsibility to exercise good judgment and common sense. Rather, it sets out basic principles to guide you and explains those situations that you are most likely to encounter. Grifols’ policies and procedures provide additional, more specific guidance.



## Grifols' Guide to Ethics

### **What Grifols Expects of You**

At Grifols, compliance is a responsibility shared between the Company and each of its employees. Grifols is responsible for providing you with the framework for how Grifols will comply with applicable laws and regulations; monitor compliance efforts; and address items of non-compliance. You, as an employee, are responsible for understanding legal requirements as they apply to your job responsibilities and conducting yourself in accordance with the standards set forth in this Guide. You must also seek guidance when you need it or have any questions about appropriate behavior.

### **What Grifols Expects of Management**

Senior management at Grifols has the added responsibility of serving as role models for our employees. They must demonstrate support for these standards and encourage managers to adhere to the standards. Managers are responsible for ensuring that employees are given guidance and receive training on ethical conduct and legal compliance relevant to their job duties. Managers should also encourage an open environment for discussion about ethical issues.



## Grifols' Guide to Ethics

### **COMPLIANCE AT GRIFOLS - A SHARED RESPONSIBILITY**

Grifols' compliance program is designed to support legal and ethical conduct throughout the Company. It is principally comprised of the Corporate Compliance and the Corporate Compliance Committee (Committee). The Compliance Officer and the Committee will work closely with Grifols' Legal and Human Resource Departments, as well as all other Company personnel and/or departments as necessary, in carrying out Grifols' commitment to compliance.

#### **Corporate Compliance (Compliance Officer)**

The Compliance Officer is responsible for managing and implementing Grifols' compliance program, including the auditing and monitoring aspects of the program and self-evaluation programs relating to the legal and regulatory obligations of the Company. It is the responsibility of the Compliance Officer to ensure broad application and consistent interpretation of Grifols' standards throughout the Company. Specifically, the Compliance Officer is responsible for the following:

- 1) ensuring that any compliance questions or concerns of an employee are appropriately addressed;
- 2) assessing if the goals and principles of this Guide and Grifols' Code of Ethics are being followed;
- 3) investigating reports of violations of laws, regulations, this Guide or Grifols' policies; and
- 4) ensuring that appropriate action is taken in the event of a violation.

The Compliance Officer has direct access to the Chief Executive Officer and the Board of Directors.



## Grifols' Guide to Ethics

### Contacting the Compliance Officer

The Compliance Officer can be contacted through Grifols' Legal Department as follows:

**Phone:** 1-800-421-0008 (during normal business hours, Pacific Time)  
**Fax:** 1-323-441-7151  
**Mail:** 2410 Lillyvale Avenue, Los Angeles, CA 90032  
**Helpline:** 1-866-441-7196

### Corporate Compliance Committee

Because Grifols takes compliance very seriously, it has created the Corporate Compliance Committee to broaden the reach of the Compliance Officer. The Committee is comprised of representatives from various areas of the Company (Human Resources (HR), Finance, Environmental Health & Safety (EHS), Legal, Regulatory Affairs (RA), etc.). The Committee provides oversight to the Company's compliance strategy and system and is charged with keeping the Compliance Officer, the Board of Directors, and senior management informed of significant compliance issues, risks and trends. The Committee works with the Compliance Officer on a routine basis to ensure adherence to laws, regulations, and Company policies.

The Committee has the responsibility, on behalf of the Compliance Officer, for investigating significant compliance issues, or issues that are considered potentially significant violations of law or policy that put the public, the Company or its employees at risk. The Committee may seek the assistance of others throughout the Company in conducting an investigation.



## Grifols' Guide to Ethics

### Your Responsibility as a Grifols' Employee

Grifols' Code of Ethics and this Guide set forth fundamental standards for all employees. This Guide helps to explain in part what employees must do to meet the Company's ethical and legal standards.

You are expected to do the following at a minimum:

- Always conduct yourself with honesty and integrity and in a professional manner that protects Grifols' reputation.
- Treat all customers, clients and fellow employees with respect and dignity when conducting business and build business relationships based upon trust.
- Familiarize yourself and comply with legal requirements that apply to your job responsibilities as well as Grifols' policies and procedures.
- Avoid any activities that could involve or lead to unlawful conduct or harm to Grifols' reputation.
- Avoid all actual or potential conflicts of interest with Grifols in all transactions.
- Respect the confidential nature of information received from other parties with whom we do business as well as protect Grifols' confidential information.
- Promptly report all breaches of law or regulations, ethical guidelines or Grifols' policies or procedures that you become aware of, and cooperate in any audit or investigation conducted by Grifols.
- Seek guidance from your supervisor or other appropriate resource, such as the Compliance Officer, or a representative of the Human Resources or Legal Departments, in the event you encounter a situation not covered in this Guide or if you are in doubt about how a policy applies.



## Grifols' Guide to Ethics

### Reporting Concerns

Grifols recognizes that the only way for the compliance system to be effective is to rely upon you as employees. In addition to your responsibility of upholding the standards set forth in this Guide to Ethics and Grifols' policies and procedures, you are responsible for reporting concerns you may have about potential risks to the Company. The main objective here is for you to raise issues before they become problems.

If you have reason to believe that a colleague of yours is in violation of, or may violate, a law, regulation or Company policy or procedure, you **MUST** report that information immediately to your supervisor or other resource as defined in the Reporting Policy. If you have a question as to whether to report a potential or actual violation, it is always best to raise your concern.

There are many potential negative consequences for Grifols, our customers, patients and employees in the event of non-compliance. Therefore, it is important to raise your concerns so management has ample opportunity to address potential problems. Some of the consequences of non-compliance include, but are not limited to, the following:

#### **For Grifols:**

- Criminal and civil penalties for the inappropriate actions of Grifols' employees.
- Loss of existing business.
- Loss of credibility with governmental agencies.
- Environmental, health and safety risks.
- Damage to Grifols' reputation, its relationships and prospective business opportunities.
- Risks to product safety.



## Grifols' Guide to Ethics

### **For Employees:**

- Criminal and civil penalties for the inappropriate actions.
- Immediate termination of employment.
- Negative impact on performance evaluation resulting in loss of potential incentives or increases.
- Damaged reputation.
- Other forms of discipline as determined by Company management.

### **Protecting your Anonymity**

There may be instances where you feel uncomfortable about reporting the conduct of another. We understand this and it is important to Grifols that you feel comfortable and secure when participating in the Company's compliance system. Therefore, an emphasis is placed on confidentiality and Grifols will make every effort to protect your identity whenever you participate in any element of the compliance program. There may be situations, however, where it may be impossible to maintain confidential your identity due to various legal requirements or in order to conduct a meaningful investigation. If you ever have a concern regarding the protection of your identity, you have the option of reporting anonymously by using the Grifols' Ethics Helpline.



## Grifols' Guide to Ethics

### Grifols' Ethics Helpline

We have established the Grifols' Ethics Helpline for use by all Grifols' employees, as well as contractors and vendors. The Helpline is a toll free message line that allows you to raise questions or report suspected violations of Grifols' policies or legal compliance. The Helpline is in place to supplement, rather than replace, existing reporting channels. You have the option to identify yourself when you use the Helpline or you may remain anonymous. Calls to the Helpline will not be traced.

In general, it is important that you try to be as specific as possible when reporting a concern. If you suspect misconduct, but you are unsure whether you have all of the facts, call and report the facts that you do have. Information such as the parties involved, when and where something occurred, and whether the problem is ongoing is helpful to Grifols in analyzing your concern. The more specific information you are able to provide the better and more thorough we are able to investigate.

Grifols will respond promptly to legitimate concerns raised via the Helpline. The Compliance Officer, together with the assistance of the Compliance Committee, if necessary, will carefully evaluate each reported concern prior to initiating an investigation or other follow-up. Do not conduct your own investigation under any circumstances. Please keep in mind that follow-up by Grifols regarding a reported concern might not be apparent to you because of issues of confidentiality and the need to conduct a thorough investigation.

The Helpline is available 24 hours a day, 7 days a week, 365 days a year. To reach the Helpline, call toll free 1-866-441-7196.



## Grifols' Guide to Ethics

### Open Door Policy

Grifols supports an open door policy with respect to compliance and promotes open discussion and accessibility to achieve this purpose. We are not experts in all areas and often times it may be necessary to seek advice or assistance in order to resolve an issue. The Company firmly believes that the majority of issues can be resolved within your department before they become problems for Grifols, you as employees, or the public. The goal of this open door policy is to encourage you to openly discuss your ideas, raise concerns and seek guidance regarding legal, ethical and quality issues. All Grifols' employees in a supervisory role are responsible for adhering to this open door policy and for allowing employees to approach them to discuss issues when the need arises.

While we are confident that the majority of issues you may have can be resolved by talking to your supervisors, the Company understands that this might not always be the case. There may be occasions where you do not feel comfortable discussing an issue with your supervisor. When a situation like this arises, you are also free to speak to others as follows:

- The next line of supervisor;
- Your department head;
- Your human resources representative;
- Contact the Helpline;
- A member of the Legal Department
- Senior Management
- The Corporate Compliance Committee; or
- The Compliance Officer.



## Grifols' Guide to Ethics

### **No Retaliation Policy for Bona Fide Reports**

You will not be punished for reporting or asking about possible breaches of law, regulation, or Company policy or procedure. Retaliation against you for raising a concern or reporting misconduct is strictly prohibited. Any individual that retaliates against you when you have truthfully and in good faith reported a violation, or potential violation, will be investigated by the Committee and/or Compliance Officer. The Company will take appropriate action against such an individual, even if it later turns out that you were originally mistaken in reporting the matter.

Grifols will also take appropriate action against you if you intentionally submit, or cause to be submitted, a false report.

If you feel that you have been retaliated against for making a bona fide and good faith report of misconduct or for raising a concern or seeking advice about potential misconduct, you should contact the Compliance Officer or call the toll free Helpline.

### **Disciplinary Action**

Grifols attaches the utmost importance to obeying the law, complying with this Guide to Ethics, and behaving correctly. Grifols will take disciplinary action, up to and including termination of employment, against any employee regardless of level, who engages in, causes, tolerates or condones any form of illegal or unethical conduct. Disciplinary action likewise will be taken against any employee who negligently fails to detect illegal or unethical conduct, whether by action or inaction. Grifols' senior management, Human Resources and Legal Departments, and the Compliance Officer are responsible for determining any appropriate disciplinary action.



## Grifols' Guide to Ethics

### **GRIFOLS' COMMITMENT TO OUR CUSTOMERS AND THE MARKETPLACE**

Grifols will always compete legally and ethically in the marketplace. We will act responsibly in all of our business relationships, including those with healthcare professionals, hospitals, patients, governments (foreign and domestic), regulatory agencies, customers, suppliers and vendors. We will provide safe, innovative and high quality products to our customers and will be honest and fair in all business dealings.

#### **Marketing Integrity**

Grifols will market and promote its products worldwide in conformance with the highest ethical, medical, and scientific standards. All marketing and promotional materials for our products must be true and based upon valid scientific data, will be consistent with approved prescribing information documentation, shall comply with all Grifols' policies and procedures and with all applicable laws and regulations.

All Grifols' employees involved in marketing or promotional activities are required to ensure that all materials receive Medical, Technical and Legal/Compliance review and approval, and conform worldwide to high ethical, medical and scientific standards. Further, all marketing and promotional materials and activities by Grifols must fairly represent the products or services of third parties.

We must not promote a product before it is approved for a use other than that specified in official product literature. When describing our products, we must consider the entirety of the message's impression. Omitting important information or wrongly emphasizing material may be misleading. Consult legal counsel and Regulatory Affairs in the event you are unsure about the appropriateness of the literature or promotional material at issue.



## Grifols' Guide to Ethics

### Healthcare Laws

Grifols is committed to full healthcare law compliance globally. Pharmaceutical manufacturers, including makers of biological products such as Grifols, are subject to a host of rules and regulations designed to protect the public. Grifols takes the responsibility of complying with these rules and regulations seriously. The buyer of our products is often not the individual or entity prescribing or using them. The purchaser (or reimbursing party) may be the government or a healthcare insurance company, while the decision-maker will be the doctor, the healthcare organization, or pharmacist.

As a Grifols' employee you must comply with the laws that relate to conducting business in the pharmaceutical industry. Compliance involves, among other things, complying with the Pharmaceutical Research and Manufacturers of America (PhRMA) Code, Anti-kickback Laws, and FDA Regulations. Adherence to the PhRMA Code, which has been adopted by Grifols, is viewed by the U.S. government as a good faith effort to comply with applicable federal healthcare laws. The PhRMA Code addresses general issues of interaction with healthcare providers, meals and entertainment, continuing education, and promotional and consulting services between drug manufacturers and healthcare providers. Grifols' Sales and Marketing Compliance Procedures provide specific guidance on PhRMA Code regulations.



## Grifols' Guide to Ethics

### **Product Experience and Safety Disclosure**

It always has been and always will be Grifols' practice to keep health care professionals and patients fully informed of the uses, safety, contraindications, and side effects of our products and, where appropriate, their specifications and characteristics. We provide this information in various ways, including the following: package inserts, mailings to healthcare professionals, educational and promotional materials, and informational presentations by our medical affairs or sales and marketing representatives.

The information we provide will be consistent with all scientific data and knowledge available regarding the specific products. This information must also be in compliance with ethical medical practice requirements as well as government regulations.

### **Patient Privacy**

During the course of our business activities we may be presented with the opportunity to view a person's medical records or other personal medical information. This information is entrusted to us with the understanding that it will be kept confidential. In accordance with state and federal laws and regulations, all employees must take whatever steps are necessary to ensure the confidentiality of medical information that comes into our possession. If you have any questions or need help in this area, contact the Legal Department or the Compliance Officer.



## Grifols' Guide to Ethics

### **Antitrust/Competition Laws**

Antitrust and competition laws protect free enterprise and Grifols is committed to free and open competition in the marketplace. We succeed in large part due to the high quality and competitiveness of our products and services. We support competition laws and recognize that everyone should have the opportunity to succeed on the basis of exceptional product quality and marketing skills. We expect all of our employees to strictly adhere to the letter and spirit of all competition laws in all jurisdictions.

Although the competition laws are complex and difficult to summarize, at a minimum they prohibit agreements between Grifols and our competitors that affect prices, terms, or conditions of sale. To avoid creating even the appearance of impropriety in this regard, Grifols prohibits agreements or discussions with competitors regarding the following:

- Prices, discounts or pricing policy;
- Pricing practices of distributors, wholesalers or customers;
- Marketing strategies or plans, promotions or product advertising;
- Profits, margins or costs;
- Market share;
- Bids or the intent to bid;
- Product throughput;
- Sales territories, markets or customer base; and
- Distribution practices.



## Grifols' Guide to Ethics

### **Antitrust/Competition Laws (Continued)**

Many forms of conduct are considered unfair competition and are also prohibited. Grifols considers the following to constitute unfair competition:

- Paying bribes to improve business or hurt a competitor;
- Stealing or misusing a competitor's trade secrets;
- Requiring a customer to buy from us before we will buy from them;
- Making false statements about competitors or their products; and
- Inducing customers to break contracts with competitors.



## Grifols' Guide to Ethics

### **Business Intelligence**

In our business, information is very valuable and in today's environment we have access to a significant amount of public information about other companies. It is generally not unethical or illegal to have and make use of public information in conducting our business. In fact, Grifols' ability to outperform our competitors depends in large part on our knowledge and understanding of the marketplace and those with whom we conduct business. As important as competitive intelligence is, however, we must gather such information ethically and in compliance with laws and regulations that protect others' proprietary information.

You are free to gather intelligence about companies, including competitors, from public sources such as their web sites, published articles, advertisements, public presentations, and the like. You should only accept business information about another company when you believe that receipt and use of the information is lawful and ethical, and does not violate confidentiality obligations. Using, or asking a third party to use, unlawful or unethical means such as misrepresentation, deception, theft or bribery to obtain such information is expressly prohibited. If you have any questions or need help in this area, contact the Legal Department or the Compliance Officer.



## Grifols' Guide to Ethics

### **GRIFOLS' COMMITMENT TO OUR COMPANY**

#### **Accurate Books and Record Keeping**

It is unacceptable for any employee of Grifols to render any Company books or records inaccurate. Laws, regulations, and Grifols' core ethical values require all of us to ensure that our books and records accurately reflect the true nature of the transaction(s) represented. Employees at all levels should never create or participate in the creation of records that have the effect of misleading or concealing improprieties.

Employees should not engage in any of the following:

- Make records appear to show payments being made to one entity or individual when, in fact, they are made to another.
- Submit expense accounts that fail to reflect accurately the amount and nature of expenses.
- Create records that fail to accurately reflect the nature of the transactions.
- Record sales in the books and records when the underlying transaction does not transfer the risks and rewards of ownership to a third party.



## Grifols' Guide to Ethics

### **Document Retention**

A Company record is any form of recorded information created or maintained by Grifols. This includes paper, microfilm, microfiche, photograph, map, computer disk or tape, software, audio or video tapes or other recorded information originated or received by Grifols during normal business operations.

Grifols record retention program establishes uniform and consistent retention practices, including how long records should be maintained and when they should be destroyed. Remember that records are the property of Grifols and are not the property of the author or custodian of the records. All employees are responsible for ensuring that Grifols' records are maintained, used, transferred, and disposed of in accordance with applicable regulations. Any questions regarding the retention period for a specific class of documents should be addressed to the Legal Department.



## Grifols' Guide to Ethics

### **Company Computers and the Internet**

The internet has changed the way companies such as Grifols do business. With the tremendous benefits of the internet come serious risks. For this reason, it is imperative that Grifols carefully manage employees' use of electronic communication in order to make sure that our computer systems are accessible for business purposes.

Certain uses of the internet and email system at Grifols are strictly prohibited. Employees are prohibited from using Company provided internet access or email to view, promote, download, copy, electronically distribute or otherwise access the following:

- Material that is discriminatory in nature or disparaging of others based on sex, race, sexual orientation, age, ethnicity, religious or political beliefs or any other protected characteristic.
- Material that is pornographic in nature.
- Material that advocates illegal or illicit activity.
- Materials or information that is protected by copyright laws.
- Use of language that may be obscene, sexually-oriented, derogatory, offensive, threatening, insulting or slanderous to individuals.
- Messages that solicit employees for any unauthorized purpose.
- Messages that represent a user's personal opinion to be that of Grifols.

Although you may use Grifols' electronic systems for infrequent incidental personal matters, you are not guaranteed your personal privacy on Grifols' communications systems. Grifols monitors computer use by employees, and since all documents, including electronic communications are considered the property of Grifols, they are subject to review at any time.



## Grifols' Guide to Ethics

### **Confidential and Proprietary Information of Grifols**

Grifols' employees and agents often learn confidential or proprietary information about the Company or its customers. Grifols prohibits employees and/or agents from disclosing or using confidential or proprietary information outside the Company or for personal gain, either during or after employment, without proper written authorization. An unauthorized disclosure could be harmful to the Company or a customer or helpful to a competitor.

We also work with proprietary data of customers, suppliers and joint venture partners. This is an important trust and must be discharged with the greatest care for Grifols to merit the continued confidence of its customers, suppliers and joint venture partners. No employee or agent shall disclose or use confidential or proprietary information outside the Company without Grifols' authorization, nor shall they disclose any such information to other employees except on a need-to-know basis.

### **Conflicts of Interest**

A conflict of interest exists when a person's private interest interferes in any way with the interests of Grifols. Employees must avoid actual or potential conflict of interest situations. Consequently, an employee having any interest, direct or indirect (other than an interest of 5% or less in a publicly-held company) in any supplier, client, or competitor of Grifols should make prompt disclosure to Grifols and obtain approval from the appropriate authority to continue the relationship. Management employees should not offer their skills or services to competitors or engage in outside businesses that compete with or sell goods or services to Grifols. Employing immediate family members in direct supervisory-subordinate relationships is prohibited.



## Grifols' Guide to Ethics

### **Gifts or Entertainment**

Exchanging gifts with clients and suppliers is a normal and acceptable business practice. Giving or receiving gifts of significant value, however, could compromise the objectivity of an employee as well as create the appearance of possible impropriety. Accordingly, gifts given or received by an employee in excess of \$100 (retail value), as a result of or related to his or her employment, must be disclosed to the employee's supervisor. The supervisor shall determine whether the gift should be accepted, turned over to Grifols, or returned. Gifts of perishable items (e.g., flowers and fruit baskets) or commemorative items (e.g., plaques and framed photographs) are not subject to this \$100 limit. They should, however, have little or no intrinsic or resale value. Business entertainment should be lawful and appropriate, and within acceptable boundaries of good taste and business purpose.

In addition, if you are working in Grifols' sales or marketing departments, you are subject to additional restrictions on entertainment or gifts. Please refer to Grifols' Sales and Marketing Procedure on Meals, Entertainment, and Gifts.



## Grifols' Guide to Ethics

### **Confidential Personal Data**

At Grifols we protect the privacy of patient, consumer and employee personal information. Those who we do business with or who use or prescribe our products expect this and have a legal right to privacy. Grifols is committed to complying with the existing and evolving privacy laws. We will develop policies or procedures from time to time to address these developing standards. At a minimum, we expect you to do the following:

- Do not seek access to personal information if you do not have a legitimate business need and are legally entitled to access.
- Always be extremely sensitive to the proper use or treatment of personal data.
- If you have a question as to how to handle such information, contact the Compliance Officer or the Legal Department.
- Make sure that no release or use of personal information occurs, except where authorized by Grifols' policies or procedures, or where authorized by the Legal Department.



## Grifols' Guide to Ethics

### **OUR COMMITMENT TO OUR EMPLOYEES**

Grifols overriding policy on employee relations is to treat everyone objectively and with respect. All employees are entitled to a work environment free of verbal, physical, and sexual harassment. Grifols is also committed to providing equal employment opportunity for minorities, women, veterans, and disabled persons. We believe promotion of work force diversity is an important objective in its own right, is a source of competitive advantage, and is a requirement of Equal Employment Opportunity laws.

### **Employee Relations**

Grifols has developed policies and procedures to ensure that our operations worldwide guarantee a work place that embodies unprejudiced open-mindedness toward the opinions and attitudes of others. Our employee relations policies dictate the following:

- Grifols will not tolerate impermissible discrimination or harassment of any kind in the workplace. See Employee Handbook for our policy on discrimination and harassment.
- Equal employment opportunities are provided to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability, or status as veteran in accordance with applicable federal laws. See Employee Handbook for our EEO policy.
- Grifols will provide a safe and healthy work environment for all employees. See Employee Handbook for our alcohol and drug free work policy.
- Grifols will not tolerate any threat or act of violence from or against its employees. See Employee Handbook for our policy on violence in the workplace.



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### **GRIFOLS COMMITMENT TO THE PUBLIC**

At Grifols we are committed to providing support to the communities in which we do business. Grifols is also dedicated to ensuring that the Company and its employees conduct business in line with the Company's environmental protection and safety objectives. To this end, we strive to implement innovative solutions.

#### **Publicity of Information**

Grifols places emphasis and importance on maintaining effective relationships with the media and our public. We recognize that what is said or written about the Company will have an impact on Grifols' reputation, positively or negatively. We are therefore dedicated to providing accurate information to the media and other members of the public. All public disclosures including financial information, press releases and other communications will be an honest and accurate factual representation.

In order to ensure that all information that is disclosed is up to date, timely, and accurate, all inquiries related to Grifols will be handled through the Government and Public Affairs and Corporate Operations and Development Offices of Grifols. We want to be consistent and accurate with our disclosure of information, therefore, employees are not authorized to answer questions from the media or other members of the public. If someone requesting information about Grifols' business at any level contacts you, you should record that individual's name and immediately notify either the Corporate Operations and Development Office or the Government and Public Affairs Office.



## Grifols' Guide to Ethics

### **Environment, Health and Safety**

Grifols is committed to protecting the environment and the health and safety of our employees, our customers, and the public. We strive to comply with all applicable governmental requirements and Grifols' Environmental, Health and Safety (EHS) Policy. Every employee is responsible for maintaining a safe workplace. Therefore, each employee must comply with all Company safety rules as well as the rules and regulations required by state and federal law. Copies of health and safety rules can be obtained directly from the EHS Department or on the Grifols intranet site under the EHS department section.

Grifols also strives to conduct all of its activities globally in an environmentally sustainable manner. To meet this goal, Grifols is committed to maintaining management systems, programs and procedures for the environmentally responsible operation or management of the following:

- Our research and development activities and locations;
- Our manufacturing operations;
- Our packaging locations;
- All transportation and distribution channels;
- Sales and marketing; and
- Contracted goods or services.

Environmental protection and health and safety must be an integral and inseparable part of every employee's everyday work responsibilities. For Grifols' EHS policies contact the EHS Department or visit the Grifols intranet site under the EHS Department section.



## Grifols' Guide to Ethics

### **Responding to Requests for Information from Government**

It is our policy to cooperate fully with government investigations. When an employee knows or has reason to believe that a government investigation is underway, the employee must notify the Legal Department or Compliance Officer immediately. (This obligation is distinct from the formal policies and procedures in place at Grifols for a routine government cGMP inspection of a Grifols' facility).

Full cooperation with the government means employees must properly maintain Grifols' records. Refer to the Legal Department for Grifols' records retention policies. Due to the importance of government investigations, no employee should ever do any of the following:

- Destroy company or personal documents if they anticipate a request or after receiving a request for the documents from a government agency or court;
- Alter company or personal records or documents;
- Lie or make misleading statements to a government investigator; or
- Attempt to keep a person from giving information to a government investigator, or attempt to induce a person to offer false or misleading information.



## Grifols' Guide to Ethics

### **Animal Humanity**

Recognizing the importance of the use of live animals for research, testing and improving public health, Grifols insists, for both ethical and scientific reasons, upon the highest standards for the care and use of such animals. Our goal is to ensure that when we use animals for whatever reason that such use is carefully conducted in a manner so as to minimize or avoid pain, distress or discomfort to animals. As part of this goal, we are committed to identifying alternatives to animal use whenever possible. Grifols also expects that any third parties with whom we contract adhere to the same high ethical and scientific standards.

On an ongoing basis and for as long as it is necessary, we will continue our commitment to these high standards and the ethical treatment of animals. To this end, all laboratory research and testing will meet or exceed local, national and international regulations, we will use the fewest number of animals necessary to accomplish our study goals, and we will provide superior veterinary care.

### **Political Activity**

Grifols encourages you to vote and be active in the political process as you deem appropriate. You must be aware, however, that United States federal laws restrict use of corporate funds for federal elections, and some states have similar laws. This is a very highly regulated area. As a result, employees may not conduct personal political activity on Company time or use Company property or equipment for this purpose.

**Note: The Grifols' Guide to Ethics does not change your employment relationship with Grifols and is not an employment contract. Grifols reserves the right to change the Guide at its discretion.**