

Code of Ethics and Conduct

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Letter from the Chairman

When you start out as a family business, that makes the kind of difference that lasts. And Hospiten started out as a team whose way of doing things has permeated our entire company.

We've got a long career in the health and wellbeing industry behind us, covering a number of countries. And this has enabled us to form part of lots of people's lives and understand and respond to all kinds of challenges.

As people, we've changed. Isn't it time to take a fresh approach to health? Time for patients to feel at home with us, to feel like they own their health and to feel secure enough that they can take the right decisions.

We're getting ready to be part of this change. And together we're building an ecosystem of wellbeing around people, an ecosystem where talent, technology and values combine to reach for something bigger.



Juan José Hernández Rubio

Presentation: Hospiten

Hospiten is a Spanish network of hospitals that was founded in 1969 and now operates internationally. The company's values have always been our guide, and this Code spells out the inspiring basic principles on which our organization's operation is founded and from which it draws its strength.

We regard three elements as key: our top-level team, cutting-edge technology and a philosophy of constant innovation.

We meet high standards of excellence, satisfaction and quality thanks largely to the contribution of professionals who are deeply engaged with caring for people's health.



México 01 Hospiten San José del Cabo, San José del Cabo Hospiten Cabo San Lucas, Cabo San Lucas 02 Hospiten Cancún, Cancún Hospiten Riviera Maya, Riviera Maya	03 Hospiten Puerto Vallarta, Puerto Vallarta Jamaica 04 Hospiten Montego Bay, Montego Bay Centro de especialidades Hospiten Falmouth, Falmouth	Rep. Dominicana 05 Hospiten Santo Domingo, Santo Domingo Hospiten Bávaro, Punta Jara Panamá 06 Hospiten Patilla, Ciudad de Panamá	España 07 Hospital Universitario Hospiten Bellevue, Tenerife Hospiten Tamaragua, Tenerife Hospital Universitario Hospiten Sur, Tenerife Hospital Universitario Hospiten Rambla, Tenerife	Hospiten Lanzarote, Lanzarote Hospiten Roca, Gran Canaria Centro de especialidades Hospiten Vecindario, Gran Canaria	08 Hospiten Estepona, Málaga Centro de especialidades Hospiten Algeciras, Cádiz 09 MD Anderson Cancer Center Madrid-Hospiten, Madrid Hospiten Madrid Boadilla, Madrid
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Purpose, Values and Personality

PURPOSE

Building an ecosystem of wellbeing around people

VALUES

Keeping the family spirit alive

Our culture is rooted in the personal connections we have with our own people, our relations with patients and our relations with the communities where we operate.

Valuing others

That's listening to others and respecting their opinions. It's working together, with the sum knowledge of an international team of over 5,000 professionals, each of whom has a valuable viewpoint.

Always finding a way

That means not being afraid of a blank page. Blazing new trails, with the objective of finding answers to the challenges of today and tomorrow.

Always looking ahead

Always acting bravely and challenging ourselves. Learning all the time, spurred by a sense of innovation. Working with determination every day to imagine what health and wellbeing will be like tomorrow.

PERSONALITY

Helpful

Engaged

Decisive

Determined

1.- Patients

Our patients are what we're all about. Their health, wellbeing and trust require an unwavering institutional commitment from us, pursuant to the principles of this Code of Ethics and Hospiten's founding philosophy "The patient is the only king".

We recognize each patient's dignity, and we pour all our professionalism, ethics and humanity into our work. Each person deserves our fullest dedication and respect, without exceptions, because all patients deserve to be treated with human warmth, excellence and true dedication.

We see the challenges families and friends face, too, and they deserve all our empathy and support.

All Hospiten Members must at all times act in accordance with these principles in the course of our duties, contributing actively to a patient-centric ecosystem of wellbeing.

2.- Hospiten Members

The concept of "Hospiten Members" includes everybody at Hospiten, from the directors, executives, employees, collaborators and members of our organization right down to volunteers and temporary staff working with us, no matter where they are employed or what country they are in.

We all share the values, principles and commitments defined in this Code of Ethics, which guide our decisions and behaviour every day.

We are a first-rate team that is always striving for excellence. Even if we do different jobs, we all share the same dignity and deserve the same respect.

We furnish top-quality service, supported by the finest technology within our reach, in the understanding that constant innovation, in all our areas, requires us to remain firmly committed to ongoing training and updating.

These ingredients have been the key to our success, and it is our obligation to maintain them.

Each Hospiten Member bears the inescapable personal responsibility to act according to this Code of Ethics, to comply with the law, to respect internal policies and to contribute actively to a safe, respectful working environment.

This commitment is inherent to being a Hospiten Member, and it forms a core part of our Culture of Compliance, in line with the requirements set in our Compliance Model.

3.- Respect for the Law

At Hospiten, we don't just abide by the law. No, our commitment goes beyond that.

Because ignorance of the law is no excuse, all Hospiten Members must know, understand and comply with this Code and the compliance rules that enforce it, regardless of the post they hold or the country they are in.

Sometimes local legislation is even stricter than we are, in which case it must be observed. Otherwise, if our internal rules set more-demanding standards than even the applicable laws, then it is our internal rules that set the bar, in compliance with the principles of integrity, lawfulness and institutional responsibility as defined in this Code.

Our Compliance Model forbids any behaviour that infringes and/or disregards our internal rules. We have a zero tolerance policy toward any conduct that is illegal or contrary to the principles of this Code.

Respect for our rules must never be seen as an imposition, but as a free, voluntary pledge that stems from a sense of responsibility and individual integrity.

Only on the basis of such a conviction can we build a solid Culture of Compliance to guide our actions.

4.- Business Partners

This concept includes any third party that Hospiten has or expects to have a commercial or business relationship with, whether directly or indirectly.

Our Business Partners need to be chosen carefully and responsibly and must be free of conflicts of interest. When we accept a Business Partner, that means it expressly embraces the principles and commitments established in this Code of Ethics and must behave in alignment with those principles and commitments as well as the compliance rules that apply to that particular Partner. This obligation exists regardless of the country or the function, length or nature of the relationship.

Our internal rules take priority if they set more-demanding standards than local legislation, although all mandatory provisions of local law must be observed in any case. Practices, behaviour and omissions that contradict the principles of this Code are never tolerated, even if they are legal under the third party's jurisdiction of origin.

Ignorance of these obligations does not excuse our Business Partners from their obligation to comply. Hospiten Business Partners are required to display professional, diligent, exemplary conduct and are also responsible for informing their own people and partners of these commitments.

The same standards of diligence, exemplary conduct and supervision apply to us, too. Any time a part of this Code or our compliance rules is broken, it is our obligation to report it just as soon as we learn of it.

5.- Information Management

In the course of our work, all of us Hospiten Members and all our Business Partners gain access to sensitive information. This includes personal data, clinical information, confidential patient and third-party information and business secrets.

This information lies under a strict duty of confidentiality, integrity and availability, pursuant to the general principles of confidentiality, integrity, lawfulness, minimization and proactive responsibility that govern the processing of personal data and the management of sensitive information.

The obligation of safe custody, lawful processing and responsible disclosure is a personal, direct, unavoidable obligation for all recipients of this Code, and it remains in force even after we have gone home or finished our immediate task.

A special amount of diligence in information processing is required in the health industry. Therefore, any improper use, undue access or unauthorised disclosure could have legal consequences under civil, administrative or criminal law, both for the person responsible and for Hospiten as an organization.

This obligation stands, no matter what country we are in or what role we are performing. Ignorance, carelessness or mistakes in information processing—or careless custody of the device or other medium where the information is stored—frees no-one from their responsibility. We must all limit information access, processing and disclosure to the minimum absolutely required to do our jobs.

Poor information management will not be tolerated. It may entail internal disciplinary measures under the Compliance Model and possibly action for liability under the legislation that applies to the case in question.

6.- Reputation and Due Diligence

Apart from any minor or major legal consequences, the biggest and most direct consequence of any infringement of our Culture of Compliance is damage to our reputation. That includes every person's personal reputation and Hospiten's reputation.

Our reputation is our most fragile asset. Keeping it intact requires us all to commit to acting with due diligence at all times and to commit to Hospiten's Culture of Compliance.

Due diligence is embodied in how we behave with patients and their families, how we act as Hospiten Members, what kind of relationship we have with our Business Partners, how we handle our materials and technologies (being mindful of the impact they can have on people, the environment and our institutional image) and how responsibly we use social networks.

This necessarily includes keeping a watchful eye on our technological environment: personal devices, remote access, digital media and in fact any medium that may compromise Hospiten's information or reputation.

That is why all of us are required to read carefully the rules made to enforce our Compliance Model and to use our Internal Information System to ask for the help we need if we have any doubts or concerns or to report any violations of our compliance obligations as soon as we learn of them.

7.- The Compliance Function and the Chief Compliance Officer

The Compliance Function is the cross-cutting internal authority at Hospiten that monitors legislative compliance and does the work of preventing, detecting and managing all compliance risks.

The Compliance Function shoulders the Board of Directors' mandate to promote and develop our Compliance Culture and to pursue Hospiten's other compliance objectives pursuant to the various components of our Compliance Model.

It is helmed by the Chief Compliance Officer, who reports straight to the Board of Directors and has the autonomous powers of initiative and supervision to act with the autonomy and independence the office requires.

Because Hospiten is present in a number of countries and is exposed to different compliance obligations, there may and should be different compliance officers tasked with handling specific compliance matters in targeted areas. These compliance officers are coordinated by the Chief Compliance Officer.

7.1.- The Compliance Function and the Chief Compliance Officer

In this sense, the Chief Compliance Officer also performs the specific function of a compliance officer for matters of criminal law and a compliance officer for matters of personal data protection. As a result, the Chief Compliance Officer is also the officer in charge of the Internal Information System for all the countries where we operate. To keep these tasks running smoothly, the Chief Compliance Officer may call upon whatever internal and/or external help is needed according to the circumstances of each case and may appoint any compliance officers necessary.

The Compliance Function has the authority and the legal standing to gather any information it requires from any Hospiten Member at any time, to access any records or documents it needs to perform its essential duties and to call upon any physical or human resources it requires to perform its duties and functions.

All this takes place under the Compliance Model approved by Hospiten's Board of Directors.

8.- Internal Information System

All the communication channels and other means of contact the laws require us to have are united in Hospiten's Internal Information System. The Internal Information System is the established method for querying and/or reporting any actions or omissions that may affect our compliance obligations, pursuant to the internal rules regulating the System.

At the head of the Internal Information System is the Chief Compliance Officer, who is tasked by the Board of Directors to hear all communications turned in over Hospiten's various internal reporting channels.

Our Internal Information System is a secure means of communication. It ensures full respect for personal data protection legislation, confidentiality and impartiality, and anyone who uses it responsibly in good faith can rest assured that they are safe from reprisals.

8.1.- Internal Information System

Compliance obligations are everybody's responsibility. Each and every one of us has the personal obligation to know and respect our compliance obligations. Actions and omissions that involve transgressions of our Compliance Culture, especially including the concealment of infringements, are neither tolerated nor allowed at Hospiten.

Consequently, if any of us become aware of any potential failure to uphold compliance obligations or have any doubts about what to do in regard to compliance issues, we are expected immediately to get in touch over one of the various internal reporting channels made available for that purpose.

This system has specific procedures for following up on communications, to ensure that they are properly handled and answered within the time specified by the applicable legislation.

9.- Penalization Procedure

All Hospiten Members, regardless of their place in the organization chart, country or function, are obligated to comply with this Code of Ethics, the rules enforcing it and the Compliance Model underlying it.

This obligation extends to all our Business Partners, too. They must behave in a way that aligns with our principles and rules of conduct, insofar as applicable.

It is the express wish of the Board of Directors that all infringements be analysed with due diligence by the Chief Compliance Officer or another competent authority.

Once an infringement has been confirmed, proportionate measures are taken pursuant to the applicable law, agreement or contract.

When an infringement has legal repercussions (under criminal law or any other kind of law) and involves a significant violation of the law beyond our internal rules, Hospiten reports it to the competent authorities. Hospiten also always considers taking legal action to defend its interests against the pertinent individuals and/or legal persons.

9.1.- Penalization Procedure

Nobody at Hospiten is authorized to perform, encourage, allow or justify a violation of this Code, its Compliance Culture or the rules enforcing it.

That means no one has the authority to act against the provisions of this Code, not by virtue of their position in the organization, orders received, benefits promised or pressure placed on them. Each person must bear his or her own responsibility.

So, any time we have any questions about our obligations, we should ask the Compliance Function over the Internal Information System. The System can also be used as a confidential channel for whistleblowers. Confidentiality, protection and safety from reprisals is guaranteed for whistleblowers acting in good faith.

The same principles and consequences apply to Business Partners. Compliance failures are evaluated and may eventually lead to the conclusion of the business relationship, plus any appropriate legal or contractual action.

Hospiten does not confirm, reward or maintain any advantages stemming from having infringed our Compliance Culture or broken the rules associated with it.

This procedure always applies, without exceptions, regardless of the area, role or country involved. It is an essential part of our institutional commitment to an effective, real, enforceable Culture of Compliance for all.

At Hospiten, integrity isn't a option.

**It's the way we honour those who place their trust in us,
even when they don't know it:**

“The patient is the only king”.

Pedro Luis Cobiella Suárez



Hospiten