

CODE OF ETHICS AND GOOD PRACTICES HEALTHCARE ACTIVOS YIELD SOCIMI, S.A.

This Code has been approved on January 30th 2024.

SUMMARY

The purpose of this Code of Ethics and Good Practices (hereinafter referred to as the "Code") is to ensure professional, ethical and responsible behaviour by HEALTHCARE ACTIVOS YIELD SOCIMI, S.A. (hereinafter, the "Company") and all its employees, in the performance of its activities. To this end, the principles and values that should govern the Company's relations with its interest groups (employees, clients, partners, managed companies, and suppliers) are defined. To this end, the Code:

- It establishes the principle of due diligence for the prevention, detection, and eradication of irregular conduct, whatever its nature, including, among others, the analysis of risks, the definition of responsibilities, the training of employees and, where appropriate, third parties directly related to the Company, and the formalization of procedures, especially for the notification and immediate elimination of irregular conduct.
- It takes into account the principle of criminal liability of legal persons, as set out in the legal system, and prevents and proscribes the existence of behaviour that could determine the liability of the Company.

A. General Principles

The Code is defined as an ethical commitment that includes basic principles and standards for the proper development of relations between the Company and its main stakeholders wherever it carries out its business activities. The Code is based on the following principles:

1. All the Company's operations shall be carried out under an ethical and responsible prism.
2. All the activities of the company and its employees shall be carried out in accordance with the United Nations Universal Declaration of Human Rights and the Ten Principles of the Global Compact.

3. Compliance with the legislation in force is a necessary and unavoidable requirement of the Code.
4. The behaviour of the Company's directors and employees will go in accordance with the spirit and letter of the Code.
5. All individuals and legal entities that maintain, directly or indirectly, any labour, economic, social and/or industrial relationship with the Company shall be treated fairly and with dignity.
6. All the Company's activities will be carried out in the most environmentally friendly way, favouring the conservation of biodiversity and the sustainable management of natural resources.
7. The company rejects child labour and forced labour in its activity and will avoid collaborating with organisations that do not respect this principle. It undertakes to employ people over 16/18 years of age and to reject any situation of forced, coerced or involuntary labour.
8. The company will promote equal opportunities. No person employed by the Company shall be discriminated against on the basis of race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality or gender. The Company prohibits any form of physical, sexual, psychological or verbal abuse or harassment of its employees, as well as any other conduct that could create an intimidating, offensive or hostile work environment. The Company's employees have the right to organize, freedom of association and collective bargaining. Weekly working hours and overtime will not exceed the legal limit established by applicable legislation. Overtime shall always be voluntary and paid in accordance with the law.
9. The salary received by the Company's employees is in accordance with the function performed, always respecting the applicable agreement. All the Company's employees carry out their work in safe and healthy places.
10. The Company is committed to offering all its customers a high standard of excellence, quality, health and safety in its services, and to communicate with them in a clear and transparent manner. These services will be provided in an ethical and responsible manner.

11. The Company carries out its activity in accordance with the social interest, understood as the viability and maximization of the value of the company in the long term in the common interest of all the partners.
12. The Company extends to its business partners the obligation to comply with this Code.
13. All suppliers of goods and services of the Company shall comply with the Code insofar as it is applicable to them. They must also allow any review by the Company or authorized third parties to verify their compliance.

B. Responsible Care and Practices Commitments

- Compliance with applicable legislation and the Company's internal regulations.
- Duty of loyalty and transparency with respect to the companies managed by the Company.
- Compliance with contracts signed by the Company.
- Dignified and respectful treatment towards all stakeholders.
- Objective, clear and truthful promotion of the services offered by the Company.
- Prohibition of unfair market practices and/or misleading, fraudulent or malicious conduct.
- Prohibition of any practice of corruption, bribery, fraud and/or extortion.
- Strict control of cash payments or receipts.
- Prohibition of any practice contrary to national and international money laundering regulations.
- Prohibition to make or offer, directly or indirectly, gifts, favours or compensation to any natural or legal person with whom the Company has a direct or indirect relationship or to public authorities or officials.

- Prohibition to accept, directly or indirectly, gifts, favours or compensation from any natural or legal person with whom the Company has a direct or indirect relationship or from public authorities or officials.
- Prohibition of obtaining undue tax advantages and correct treatment of the aid received by the Company.
- Obligation to avoid any situation that may involve a conflict between personal interests and those of the Company.
- Prohibition to use the goods, data and services of the Company for one's own benefit.
- Strict duty of confidentiality and protection of its content in relation to all information handled by the Company.
- Prohibition to use the works, creations or other signs of third parties protected by copyright, patents, trademarks, domain names, reproduction or design rights and business secrets.
- Prohibition of insider trading.
- Duty of information regarding the commercial, professional, reputational and remuneration suitability of suppliers proposed to be hired by the Company.
- Limitations and control of meals, expenses and gifts that may be paid to or received by Company employees from third parties in the course of their work, as well as charitable donations.
- In the use of the media, the obligation to respect the principles of legality, authenticity, transparency, belonging, confidentiality, control and supervision.

C. Compliance with the Code

The administrative body is responsible for ensuring compliance with the Code. The administrative body may act on its own initiative or at the request of any employee of the Company, or of a third party with a direct relationship and legitimate commercial or professional interest, by means of a report made in good faith.

All Company employees must respect and promote respect for the Code and, if there is no other means of resolving the conflict, must report any

practice that violates these principles and rules through the information channels made available by the Company, which include:

- The e-mail address of the Ethics Mailbox that the Company has set up for this purpose: buzonetico@healthcareactivos.com.
- Orally, by means of a face-to-face meeting with the Compliance Officer.

The Ethics Mailbox is a transparent channel for reporting, by employees or third parties, practices that may involve the commission of any irregularity or any act contrary to the law or to the rules of conduct of the Code and internal policies and procedures of the Company.

All information sent to the Ethics Mailbox shall be received directly and immediately by the Compliance Officer, who shall acknowledge receipt within three days of receipt, not exceeding seven calendar days, and shall inform the informant of the collection and processing of his or her personal data in accordance with the provisions of current legislation on data protection, unless the report is anonymous.

When the report is made through reporting channels other than those established and determined by the Company or to members of staff not responsible for its processing, the recipient of the report shall immediately forward it to the Compliance Officer. In these cases, confidentiality shall also be guaranteed.

The Compliance Officer shall provide the informant with a response to the investigative actions carried out within a maximum period of three months from receipt of the communication or, if no acknowledgement of receipt was sent to the informant, within three months from the expiry of the seven-day period after the communication was made, except in cases of particular complexity that require an extension of the period, in which case it may be extended up to a maximum of a further three months.

Likewise, in the event that it is found that there are indeed breaches, the Company will adopt, as soon as possible, the means to correct the actions and/or behaviour contrary to the Code, applying, where appropriate, disciplinary measures in accordance with the system of faults and penalties provided for in the applicable collective bargaining agreement or labour legislation.

The Ethics Mailbox must be used in good faith and, in particular, such communications must always comply with the criteria of truthfulness, and this mechanism may not be used for purposes other than those that pursue compliance with the rules of the Code.

The identity of the person who reports an anomalous action through the Ethics Mailbox shall be considered confidential information and, therefore, shall not be communicated to the reported person without the consent of the informant, thus guaranteeing the confidentiality of the identity of the informant and avoiding any type of response to the latter by the reported person as a result of the communication.

Retaliation against the informant, persons related to the informant (co-workers or family members) and facilitators is prohibited. Retaliation means any action or omission prohibited by law or which, directly or indirectly, results in unfavourable treatment that places the reporting persons at a particular disadvantage compared to another person in the employment or professional context, solely because of their status as informants, or because they have made a public disclosure.

Without prejudice to the foregoing, the data of the persons making the report may be provided both to administrative or judicial authorities, to the extent that they are required by such authorities as a result of any proceedings arising from the subject matter of the report, and to persons involved in any subsequent investigation or judicial proceedings instituted as a result of the investigation. Such transfer of data to administrative or judicial authorities shall always be carried out in full compliance with the legislation on the protection of personal data.

In any investigation, the rights to privacy, to defence, to be heard and to access to the file, to honour and to the presumption of innocence of the persons under investigation shall be guaranteed.

The information and personal data provided through the Ethics Mailbox will be treated confidentially at all times and in compliance with the applicable legislation on data protection.

The Company will develop the necessary measures for the effective implementation of the Code. No one, regardless of level or position, is authorised to request that an employee or professional commit an illegal act or act in contravention of the Code. In turn, no professional may justify improper or illegal professional practice or practice in contravention of the Code on the basis of an order from a superior.

The Code will be made available to all employees, will be published on the Company's website (www.healthcareactivos.com) and will be the subject of appropriate communication, training and awareness-raising activities to ensure that it is properly understood and implemented throughout the organisation.

Company employees know, understand and expressly accept the content of the Code by signing it. Employees who join or become part of the Company in the future shall expressly accept the vision, values and standards of action set out in the Code.