



**CONSOLIDATED NON-FINANCIAL**  
Information Statement

**2020**



April 2021



**1** Letter from the CEO

**2** About this report

**3** About us

**4** Strategy and risk management

**5** Materiality analysis

**6** Environmental concerns

**7** Social aspects and staff-related matters

**8** Respect for human rights

**9** Commitment to fight corruption and bribery

**10** Commitment to society

## Letter from the CEO

GRI 102-14

**We are facing the challenge of responding to Covid-19 while maintaining the goal of continuing to provide the best service to our Spanish and international patients..**

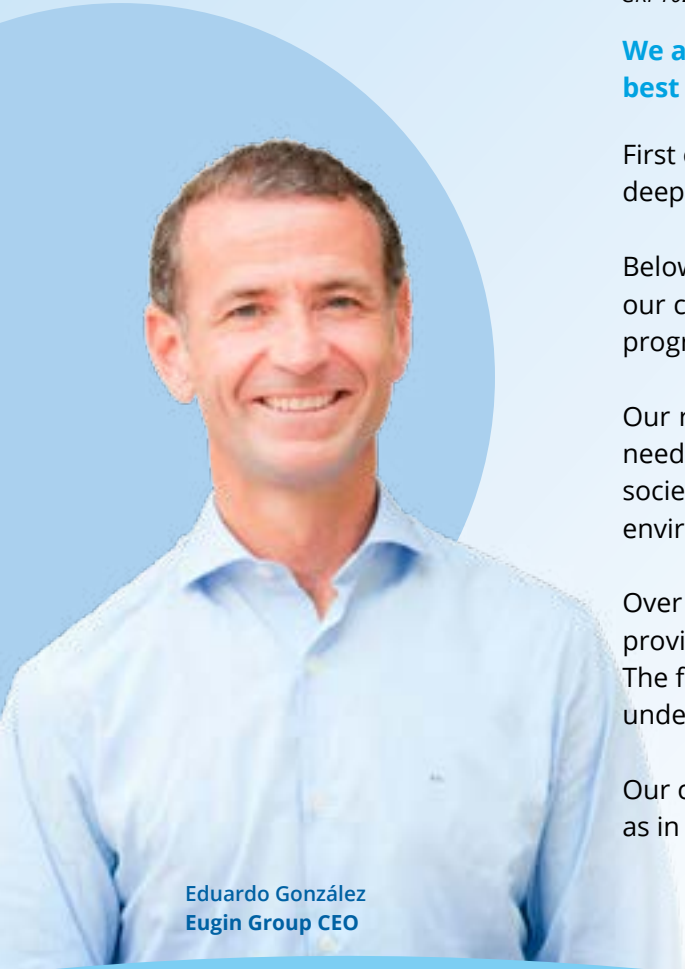
First of all, I would like to send a message of support to all those who may have been affected by this health crisis, with my deepest sympathy to all those who have lost a loved one, especially those who belong to the Eugin Group.

Below we present the Eugin Group's 2020 Non-financial Information Statement, which aims to convey to all our stakeholders our company's strategy for creating social, environmental and economic value as well as our roadmap for making further progress in our commitment to society and to the United Nations 2030 Agenda for Sustainable Development.

Our responsibility goes beyond ensuring profitability and generating economic value and we work every day to meet the needs and expectations of our patients, our team of healthcare professionals, the medical and scientific community, civil society and the public administration, while carrying out our work in accordance with high quality standards and in an environmentally friendly way.

Over the years we have known how to adapt and evolve so that we have now become a leading business group in the provision of all types of medical and research services in the field of gynaecology, obstetrics and human reproduction. The focus on people, a defining feature of the Eugin philosophy, continues to this day, even though as a company we have undergone exponential growth in our operations.

Our company stands out for its dynamic policy of ongoing improvement in technology, research and development, as well as in healthcare quality, which has positioned us as a benchmark in this field.



Eduardo González  
Eugin Group CEO



In 2020, like the vast majority of organisations worldwide, we also face the enormous challenge of responding to the conditions set by the impact of the current pandemic while maintaining the objective of continuing to provide the best service to our local and international patients, but in a radically different environment. We have added to our traditionally high standards of quality all the necessary resources and made significant investments to guarantee 100% protection against the virus for all the people within our sphere of influence, including both patients and company personnel.

We carry out our work by promoting social and environmental responsibility and good governance. In the area of good governance, we have a set of programmes, policies and procedures that guarantee regulatory compliance, as well as an efficient and transparent management of the company. In the social sphere, we play a leading role in the creation of employment and local development, and are committed to the development and continuous training of our team of dedicated professionals while facilitating a supportive, egalitarian, diverse and inclusive working environment. In the environmental sphere, we promote energy saving in our facilities, as well as the prevention and responsible management of waste.

Nevertheless, we remain steadfast in our objectives for the coming years so as to continue adding social and environmental value to our business.

**Eduardo González**  
Eugin Group CEO



# 2

## About this Report



### About this Report

*GRI 102-45, 102-50, 102-51, 102-52 y 102-53*

This **Non-Financial Information Statement** shows the information and data relating to the year ended 31 December 2020 of **Luarmia, S.L. and subsidiaries**.

This **Non-Financial Information Statement** has been prepared pursuant to and in line with the requirements of **Law 11/2018, of 29 December, on non-financial information and diversity** approved on 13 December 2018 by the Congress of Deputies, amending the Code of Commerce, the consolidated text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on the auditing of accounts, in matters relating to non-financial information and diversity.

Within this framework, through this Non-Financial Report, Luarmia S.L. and its subsidiaries aim to report on **environmental, social, economic, personnel, human rights and community impact issues** relevant to the organisation in the performance of their business activities.

The guidelines and requirements of the **Global Reporting Initiative** (GRI) standards have been taken into consideration in the preparation of this Report.

This is the third non-financial report produced and presented by our organisation, which will henceforth be prepared on an annual basis.

Should you have any doubts or questions regarding the Report and its contents, you can submit a query by sending an e-mail to the following address: [contabilidad@eugin.es](mailto:contabilidad@eugin.es).





# 3

## About us





## Introduction

**Eugin is the leading provider of medical and research services in the fields of gynaecology, obstetrics and human reproduction..**

**Luarmia, S.L.** (hereinafter Eugin Group, Eugin or Group,) is a leading business group in the provision of all types of medical and research services in the fields of gynaecology, obstetrics and human reproduction with over 20 years of experience and a proven track record.

## Our business

*GRI 101-2, 102-2, 102-6, 102-7, 102-10*

**Eugin is a multinational, multi-site company with a presence in 9 countries.**

Since its inception, Eugin has always retained a unique identity that has made it one of the benchmark clinics both in Spain and in Europe. The focus on people (and patients) is a defining feature of Eugin's philosophy and is still the same today, although as a company it has experienced exponential growth in both its business activities and the number of people it employs. The company's main clients are couples and/or single women who want to have a child through assisted reproduction techniques.

Eugin is now a multinational, multi-site company. It enjoys a global presence in the following countries: Spain, Brazil, Italy, Colombia, Denmark, Sweden, Argentina and Latvia.

The Eugin Group's main markets are those in which the Group is operating; however, depending on the specific characteristics of the countries, it also works with patients in other countries bordering on the ones mentioned above.



*The services offered by the company are presented below:*

- **In Vitro Fertilisation.** In Vitro Fertilisation is a laboratory technique that allows an egg to be fertilised with a sperm outside the uterus.
- **Artificial Insemination.** With Artificial Insemination (AI), sperm that are selected from a sample are placed in the uterus. They can be from the partner (AIC) or from an anonymous sperm donor (DAI). To increase the chances of pregnancy, the ovaries are hormonally stimulated and ovulation is monitored to determine the best time for insemination.
- **Egg and sperm donation.** The Eugin Clinic is among the European clinics with the highest number of treatments of this type, and its selection system is one of the most recognised and perfected.

Thanks to an altruistic gesture such as donation, many couples and single mothers can fulfil their dream of becoming mothers. In the case of Spain, where donation is anonymous, the donor and recipient will never know each other's identities.

- **Egg vitrification and embryo cryopreservation.** Egg vitrification consists of the preservation of a woman's mature eggs using the flash freezing method, which keeps these cells unaltered for an indefinite period of time. Our studies show that the fertilisation rate for vitrified eggs is very similar to that of eggs retrieved from the body.

While embryo cryopreservation is applied in IVF cycles, when several good quality embryos are available, they are saved for future attempts. This process does not modify or alter the quality of the cryopreserved embryos and allows for very high survival and pregnancy rates.

## Mission, vision and values

GRI 102-16

The Code of Ethics includes all those principles and guidelines of good governance that are essential in the carrying out of the company's business. Below, we define our mission, vision and values:

- **Vision:** the vision is to transform this world into a world in which every woman who feels the wish to become pregnant is able to do so.
- **Mission:** to ensure the patients' maximum wellbeing at all times, by applying the very best assisted reproduction techniques, which are backed by scientific rigour and medical excellence.

Personal and professional ethics, excellence, a vocation to serve, and commitment and dedication are the **5 values** that define the true essence of Eugin.

**Personal and professional ethics:** People are characterised by exercising their profession through honesty and consistency in their actions, as well as transparency in their communication.

Personal and professional ethics are based on concepts applicable to how we are as people and how we work:

- ▶ Honesty in the performance of one's profession is a priority.
- ▶ The company is consistent in its behaviour, knowing that leading by example sets a precedent for how to act.
- ▶ We are committed to communication that gives priority to transparency.

***Excellence:*** people act with total professionalism and the utmost thoroughness, characteristics that define our processes and procedures. In this regard, the efficiency and effectiveness of the work done and the constant drive for improvement allow us to evolve in order to achieve the best possible results.

Excellence as a value hinges on key sub-values such as:

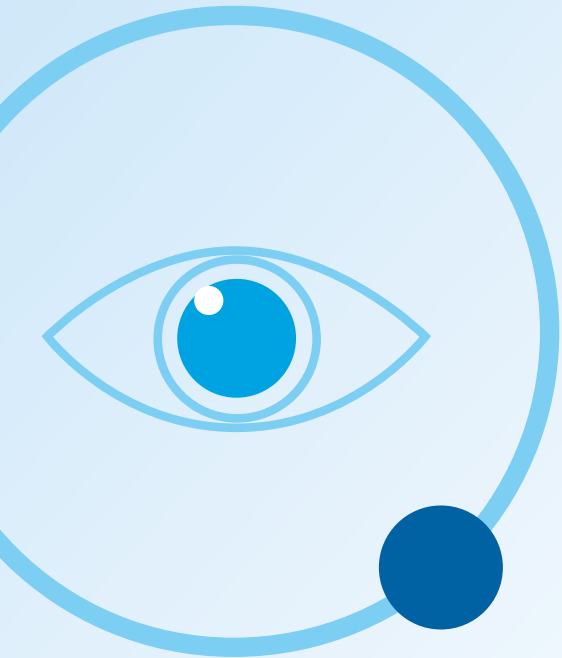
- ▶ Thoroughness and professionalism when working (regardless of the function performed). The evidence-based medicine approach clearly distinguishes and exemplifies this value.
- ▶ Efficiency and effectiveness when it comes to implementing processes and the day-to-day running of the clinic, while always seeking continuous improvement and the best results in order to meet patients' expectations.

***Vocation to serve:*** people are characterised by providing excellent service to patients, caring about their needs, empathising and listening to their requests. In addition, they try to anticipate their needs, focusing on the solution and not on the problem.

- ▶ The vocation to serve is structured around the moment of vulnerability and uncertainty that the patient is experiencing, causing him/her to expect a lot from us, requiring our full attention. All our efforts are focused on offering help and understanding. Empathy and active listening are defining features of the Eugin staff profile, both when relating to the patient and among the Eugin staff themselves, which in turn creates a pleasant working environment.

***Commitment:*** our commitment is total, both to patients and colleagues. The company takes responsibility for everything the patient does and expects, and is fully involved as a team in offering the best possible solution.





***Dedication:*** people's dedication is shown through their utmost interest and willingness to carry out the tasks and functions entrusted to them, and to dedicate the time needed to resolve them. This willingness is perceived both by the patient as well as by the co-workers themselves.

- ▶ The willingness and flexibility to adapt to any situation for the benefit of both patients and colleagues is reflected in a patient-oriented daily routine, thus facilitating the performance of one's own work and that of others, by investing the time required to meet the needs of the patients.

Eugin also adheres to a **Code of Ethics**, as an essential document that sets out the guidelines for professional and environmental conduct. The Code of Ethics includes all those principles and guidelines of good governance that are essential in the carrying out of the business. When working in the field of health, it is even more important to maintain an exemplary attitude in any of the issues addressed, as everything the organisation does directly affects people and society.



4

Strategy and risk management





### Corporate strategy

*GRI 102-11*

#### **Eugin operates an Integrated Management System.**

Since its foundation, Eugin has maintained a unique identity that has made it one of the benchmark centres both in Spain and in Europe. Its dynamic policy of continuous improvement in technology, research and development, as well as in healthcare quality, has made it a leader in this field. The Group conducts its business by fostering social and environmental responsibility and respecting compliance with the legal requirements associated with its work. Furthermore, the focus on people (and patients), which is the defining feature of Eugin's philosophy, has been retained to this day, even though the company has experienced exponential growth in terms of both its business activities and the number of people it employs.



In order to achieve continuous improvement in its operations, Eugin fosters a spirit of participation in the implementation of projects that lead to improvements in the services and activities carried out at its centres. In the scientific field, the company promotes research projects (R&D) with the aim of promoting and developing cutting-edge and competent research on an international level. Eugin also runs a basic **research department** located in the Barcelona Science Park (PCB).

Eugin implements a **Regulatory Compliance Programme** which aims to establish the principles, procedures and tools to manage the legal obligations to which the Group is subject and to mitigate the risks of non-compliance in order to achieve the targets set out in the compliance programme.

The Eugin Group companies in Spain also have a **Quality, Environmental and Occupational Safety Policy** that applies to the companies Euvitro, CIRH and Fecunmed in all phases of their operations: diagnosis and treatment of sterility, obstetric and gynaecological monitoring, research carried out by the Eugin Foundation and the administrative and support activities that are required for the aforementioned.

All of the Group's assisted reproduction treatments and techniques are endorsed by a number of integrated quality management systems, one of which is the certification of its Quality, Environmental and Occupational Safety Management System based on the ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007 standards. Eugin is also certified in the ISO/IEC 27001:2013 standard for Information Security and Data Protection.



Eugin also applies the measures needed to guarantee information security by means of an information security system, which is reviewed annually by the Management, and which includes the application of **standards, procedures and controls** that ensure the confidentiality, integrity and availability of information, essential for:

- Compliance with current legislation on information systems and personal data protection.
- Ensuring the confidentiality of the data obtained and managed by Eugin.
- Guaranteeing the availability of information systems, both in the services offered to customers and for internal management.
- Ensuring the responsiveness to emergency situations, by restoring the functioning of critical services in the shortest possible time.
- Avoiding improper alterations to information.
- Promoting information security awareness and training for all staff involved.

Eugin is certified in the ISO/IEC 27001:2013 Information Security and Data Protection standard. To this end, Eugin deploys a General Data Protection Regulation (GDPR) Committee and a Data Protection Officer (DPO) in each of the countries in which it operates as key players in guaranteeing the protection of personal data. In 2020, Eugin drew up an **Information Risk Analysis Methodology** document to assess and address risks and to define what is an acceptable level of risk in accordance with the ISO/IEC 27001 standard.

### Identification and management of risks

In the context of the different control and management systems implemented by Eugin, the organisation identifies and manages the risks arising from its business activities through risk maps, which are updated approximately every three years, and where potential risks and action plans for their mitigation are identified.





5

Materiality analysis





## Materiality analysis

*GRI 102-46, 102-47*

As part of the preparation of the Non Financial Information Statement, Eugin has conducted a **Contextual Materiality Study** to identify the relevant issues to be included in this Report.

In the preparation of this Report, a process of contextual analysis of the organisation has been carried out, taking into account the issues relevant to Eugin's business sector and the reference frameworks established by the Global Reporting Initiative (GRI), the Governance & Accountability Institute (G&A) as well as the Sustainability Accounting Standards Board (SASB).

This process has been developed with the aim of ensuring that the Report includes the most significant economic, social and environmental aspects for the organisation and which substantially influence the assessments and decisions of stakeholders.



## Material aspects according to area

GRI 102-47

### • Environmental issues

- Circular economy and waste prevention and management
- Sustainable use of resources
- Climate change

### • Respect for human rights

- Respect for human rights

### • Social and staff-related issues • Society

- Job creation
- Health and safety
- Social relations
- On-the-job training
- Equality
- Commitment to sustainable development
- Sub-contracting and suppliers
- Consumers
- Tax information

### • Fight against corruption and bribery

- Corruption and bribery

The **aspects identified as material** have been considered to determine the content of this Report, based on the requirements of Law 11/2018.

Within the frame of reference **established by the contents of the GRI** standard, Eugin's Report includes other economic, environmental and social issues set out in this standard.

## Material aspects covered

GRI 102-46



Material aspects	Internal coverage	External coverage
<b>Environmental</b>		
Pollution	X	X
Circular economy and waste prevention and management	X	X
Sustainable use of resources	X	X
Climate change	X	X
Biodiversity protection	X	X
<b>Social and staff-related</b>		
Job creation	X	
Health and safety	X	
On-the-job creation	X	
Equality	X	
<b>Respect for human rights</b>		
Respect for human rights	X	X
<b>Fight against corruption and bribery</b>		
Corruption and bribery	X	X
<b>Society</b>		
Commitment to sustainable development	X	X
Subcontracting and suppliers		X
Consumers		X
Tax information	X	



6

Environmental concerns





## Environmental management

GRI 304-2

**The Environmental Policy sets out Eugin's commitment to sustainable business development.**  
*The Eugin Clinic in Barcelona is certified under the ISO 14001/2015 standard.*

Eugin operates a **Quality, Environment and Occupational Safety Policy** that applies to the companies Euvitro, CIRH and Fecunmed at all stages of their business activities.

In the environmental sphere, the Policy establishes the commitment to the sustainable development of the business, by preventing pollution and minimising the environmental impact of its operations, and making more efficient use of natural resources and energy. In addition, it establishes the provision of all necessary human and material resources and the ongoing training of internal staff to ensure that our business activities are carried out in accordance with environmental protection standards. The Eugin Clinic in Barcelona is certified in accordance with ISO 14001/2015.

Given the characteristics of Eugin's business, the company's impact on the environment is low and is mainly related to the means of transport used by customers to get to the organisation's facilities, as well as that of staff and suppliers. With regard to pollution, it should be noted that the organisation's activities do not involve atmospheric emissions of polluting gases, and no noise or light pollution has been identified, as well as no significant consumption of fuel or fluorinated gases. Likewise, its activities have not been identified as having a significant impact on biodiversity.

To assess the effectiveness of the environmental management system, Eugin has various mechanisms at its disposal, such as external/internal verification audits and measurement systems.



*In 2020 Eugin has set two strategic objectives in the environmental sphere, which are as follows:*

- **To raise awareness and sensitise the organisation as a whole to environmental issues** with the aim of promoting the proper use of resources and good recycling practices
- **Extend the scope of ISO 14001** to the remaining facilities in Spain.

## Circular economy and waste prevention and management

*GRI 306-2*

Aiming to work in a way that respects and protects the environment, the company strives for the prevention and proper management of the waste it generates, by promoting its reuse and recycling.

For this purpose, Eugin implements a **procedure for waste management and safety measures**. This procedure affects all waste produced on the premises of the Eugin Clinic in Barcelona.

The clinics belonging to the EUGIN companies in Brazil have a **Health Services Waste Management Plan**, whose aim is to ensure that the collection, storage, transport and disposal of the waste produced is carried out correctly, thus minimising the risks to health and the environment, and in accordance with the legislation in force.

## Sustainable use of resources

*GRI 301-1, 302-1, 302-2, 303-5*

In order to work in a way that respects and safeguards the environment, the company consumes the resources it uses in the performance of its activities in a responsible manner.



7

Social and staff-related matters







## Social and staff-related matters

GRI 306-2

**Eugin is engaged in a large number of initiatives aimed at positioning the company as an excellent place to work and develop professionally..**

The labour area is regulated in accordance with the workers' statute, the relevant collective bargaining agreement and regulatory compliance regarding workers' rights. In addition, Eugin carries out a large number of human resource initiatives and policies that go further and seek to position Eugin as an excellent place to work, to develop professionally and as a cutting-edge employer in all areas.

*In this regard, the following awards are worth mentioning:*

- Catalunya Flexible Company Award 2012.
- Human Capital Award 2013 (special mention in welfare policy category).

These initiatives and policies are based on the corporate values and the Code of Ethics, which are Eugin's guiding principles of behaviour. The company also has other codes of conduct, both general (such as the confidentiality commitment, the guide to conduct at the new corporate headquarters and the code of good practice in the use of technology) as well as specific ones for certain groups (code of conduct for nurses).

The Human Resources Department provides the Eugin team with an e-mail box ([rrhh@eugin.es](mailto:rrhh@eugin.es)) through which all questions, complaints, grievances, and comments can be sent.



## Job creation

GRI 102-7, 102-8

**Eugin promotes job creation through a range of different lines of action depending on the company's needs.**

- **Recruitment:** Eugin seeks to establish long-term employment relationships, focusing on maintaining employment and minimising the outsourcing of personnel to third parties to fill temporary or permanent vacancies within the company's own teams.
- **Diversity:** Eugin's workforce is diverse and very varied in all possible spheres, given that the selection processes for professionals seek to match the profile to the person without taking into account gender, age, culture or any other reason that does not respond to the required fit. Eugin complies with the regulatory requirements set out in this regard, such as the General Law on Disability and the Equal Opportunities Plan.
- **Internships:** Each year, Eugin offers and promotes internships in all its facilities and in all its different fields, whether they are undergraduate or master's degree students.. The departments with the highest number of students are the laboratory, the research department as well as the organisational departments (Finance, Marketing and Human Resources).



## Distribution of the workforce



As of 31 December 2020, **Eugin España** has **390 employees**, of which 310 are women (79.49%) and 80 are men (20.51%). In terms of age, 46.92% of the workforce is concentrated in the 30-39 age bracket. Regarding the distribution of the staff by professional categories, the most represented category is office staff, which represents 45.38% of the total workforce.



As of 31 December 2020, **Eugin Brasil** had a headcount of **239<sup>1</sup> employees**, of which 200 are women (83.68%) and 39 are men (16.32%). In terms of age, 44.54% of the workforce is concentrated in the 30-39 age bracket. With regard to the distribution of the staff by professional category, the most represented category is office staff, which accounts for 31.51% of the total staff.



**Eugin Italia** has **54<sup>2</sup> employees** as of 31 December 2020, of which 522 are women (96.30%) and 2 are men (3.70%). In terms of age, 46.30% of the workforce is concentrated in the 30-39 age bracket. Regarding the distribution of the staff by professional categories, the most represented category is that of Other health technicians, which represents 59.26% of the total number of staff.

<sup>1</sup> Of the 239 people on the payroll, 42 of them have a freelance contract and are in the category of Advanced Healthcare Graduates.

<sup>2</sup> Of the 54 people on the payroll, 37 of them have a freelance contract and are in the category of Advanced Healthcare Graduates.



In Spain, Eugin has **4 women on its governing bodies**, accounting for 33.33%. In Brazil, women represent 20% of the governing bodies and in Italy 50%.

In Spain, Eugin employs **8 people with disabilities as part of its workforce**. In Brazil, it has 2 employees with disabilities and in Italy there is one employee with a disability.

In this area, it is worth highlighting the EUGIN initiative in Brazil, where companies in the country have implemented a policy of providing **2% of jobs for people with disabilities** in accordance with local legislation.

**Eugin encourages permanent contracts**. As can be seen in the following table, in Spain most of the workforce, 84.87%, has a permanent contract. In Brazil, 82.42% have a permanent contract and in Italy 98.14%.

## Remuneration policy

Eugin has a **Remuneration Policy** created in 2017, which was updated in 2019 and 2020, with the aim of establishing remuneration for the company's professional staff that is in line with the dedication and responsibility undertaken, and which is also market-competitive.

*Eugin has a range of remuneration benefits.*

At EUGIN companies in Brazil, employees are covered by a corporate health insurance that covers 99% of surgeries, medical consultations and examinations in the best hospitals in Brazil.



## Work organisation and work-life balance

### **Eugin offers a range of measures to promote work-life balance.**

In the area of work-life balance and work organisation, mechanisms, benefits and resources aimed at promoting an effective work-life balance among the workforce have been gradually introduced since 2018.

#### *Some of the most important measures are, for example:*

- Telework policy.
- Improved conditions for cumulative lactation.
- Hours bank.
- Other measures such as: continuous working day, change of shift, flexibility in relation to the distribution of holiday days, additional personal leave days, rescheduling of the working day on specific dates during the Christmas period, requesting and making up absences, as well as additional holiday days.

Within the framework of effectively promoting a work-life balance, Eugin respects the right of employees to digital disconnection, although it does not currently have a specific and approved policy on this issue.

## Health and safety in the workplace

GRI 403-8, 403-9, 403-10

### Commitment to occupational health and safety

Eugin has a Quality, Environment and Occupational Safety Policy that applies to all phases of its operations.

*In the area of Occupational Safety, the Policy is set out on the basis of the following principles:*

- **Active protection of the health and safety of our employees** and our facilities during the performance of Eugin's operations in order to ensure a healthy environment and safe conditions for our in-house staff, patients and society in general.
- Provision of all the **necessary human and material resources** and continuous training of in-house staff in order to ensure that all activities are carried out in accordance with occupational safety standards.

As such, Clínica Eugin Barcelona is certified in accordance with the OSHAS 18001 occupational health and safety standard and ISO 45001 (currently in force in EUGIN Barcelona and to be implemented in all centres by the end of 2021).

Likewise, Eugin implements an **Occupational Risk Assessment Procedure** which sets out the criteria and methodology used in relation to the identification and assessment of risks that may affect people's health, both in terms of its content and the methodology and system used to prepare it. The assessment considers the existing or anticipated working conditions, whether routine or non-routine, for which the technicians of the assessment team carry out visits to the facilities, taking readings, collecting data and interviewing the staff about the activities carried out and the conditions in which they are undertaken.





Eugin has a **Health and Safety Committee (HSC)** whose purpose is to monitor both indicators and projects and initiatives related to the effective prevention of occupational risks in Eugin.

As part of its preventive activities within the context of the COVID-19 pandemic, Eugin has carried out various anti-covid prevention and communication initiatives for all its centres, publicising the **Coronavirus Action Protocol (COVID-19)** as well as, among others, the guidelines to be followed in relation to attendance at congresses and other types of travel, limiting face-to-face meetings, rotating between teams and teleworking, minimising the need for people to travel, the de-escalation protocol and the document to resolve patients' doubts regarding COVID-19. In this regard, in conjunction with the prevention service, the company has also developed an online training course on COVID-19.

The reporting of potential risks is done through the "register for the reporting of potential risk". Possible accidents at work are investigated in detail, in accordance with the procedure for reporting and instructions in such situations.

The prevention service is fully available to workers through the [prl@eugin.es](mailto:prl@eugin.es) mailbox. This communication mechanism allows all doubts, questions and suggestions on risk prevention to reach the appropriate interlocutors in order to be answered. Likewise, the intranet document section contains the various reference documents on health and safety, which can be consulted at any time by any member of the Eugin workforce.



## Social relations

GRI 102-41

Eugin Barcelona has had a Works Council since 2017. The Human Resources Department centralises relations with the Works Council, through monthly meetings with a prior agenda and for which internal information minutes are drawn up. Eugin's General Management regularly takes part in these meetings.

In addition to the meetings with the Works Council, various commissions have been set up, made up equally of members of Eugin and the Works Council. These commissions, promoted by Eugin's management, are intended to be forums for discussion and agreement with the Works Council on issues of particular relevance from the human resources point of view.

In addition to promoting social dialogue through the Works Council, the company promotes internal communication in all possible ways and the participation of employees in all forums in which the opinion of the workforce contributes value and which must be taken into account.

The main communication tools currently in place are: the intranet, releases, communication to management, meetings with management.

### *The Collective Bargaining Agreements applicable to Eugin in Spain are as follows:*

- Collective bargaining agreement for healthcare establishments providing hospitalisation, care, consultation and clinical analysis laboratories in Catalonia 2019 - 2021
- Collective bargaining agreement for the offices and business premises sector in Catalonia for the years 2019-2021
- Collective Bargaining Agreement for the Office and Business Premises Sector of the Community of Madrid 2019-2021
- Collective Bargaining Agreement for Healthcare Establishments providing Hospitalisation, Healthcare, Consultations and Clinical Analysis Laboratories in the Community of Madrid 2016-2020





## Training and professional development

GRI 404-1

Eugin promotes staff training, especially in those subjects related to its field of activity, as well as the learning of languages and other transversal and specific skills. In this respect, the organisation tries to facilitate the opportunity to combine working while pursuing higher level studies directly related to the employees' professional field (masters, postgraduate degrees or similar).

*The company has a Training Policy drawn up in 2020, which in general terms is structured under the following points:*

- **Language training:** given EUGIN's international profile, language training is a clear and decisive priority.
- **Technical training:** Job-specific technical training is particularly relevant to ensure the best and most up-to-date medical
- **Master's degrees and postgraduate courses:** in order to contribute to the professional development of the staff, as well as to broaden the range of functions and jobs, there is a policy aimed at encouraging higher levels of training for EUGIN staff who may require it. This policy includes the total or partial financing of masters and postgraduate studies, which are evaluated on a case-by-case basis.
- **Skills and development:** with the aim of contributing to professional development, both assessment and training in skills are fostered in those groups that require it. Within this framework, the company operates a performance evaluation system in which the following are evaluated:



### Cardinal Competencies:

1. Applicable to all members of the organisation
2. They represent the essence and basis of corporate culture (5 Eugin values).

### Managerial Competencies:

1. Applicable to groups with responsibility for teams or project functions
2. They represent the competencies that make up our Eugin Leadership Model (8 Eugin Leadership Model competencies).

### Operational Competencies:

1. Applicable to the different levels of staff in the organisation
2. They represent attitudes and/or skills needed for the different job positions

Each year, Eugin's training plan includes training activities and initiatives in each of the areas described. Training plans can include both one-off actions at a specific time (e.g. empathic skills course for the medical profession) and recurrent actions aimed at long-term development (e.g. language courses).



## Equality and diversity

Eugin declares its commitment to the establishment and development of policies that integrate equal treatment and opportunities between women and men, without discriminating directly or indirectly on the basis of sex, as well as to the implementation and promotion of measures to achieve real equality within the organisation, establishing equal opportunities between women and men as a strategic principle for the Group.

It is in this context that the Equality Plan is framed, which is an instrument that transfers to the business world a whole set of values, initiatives and measures that have a common purpose, which is to guarantee the principle of equal opportunities between men and women. The Equality Plan sets the specific equality objectives to be achieved, the strategies and practices to be adopted for their attainment, as well as the establishment of effective systems for monitoring and evaluating the objectives set.

The **Equality Committee** is the internal management and monitoring body of the Equality Plan. It meets on a quarterly basis to monitor the measures underway, as well as to address any additional proposals that may be considered appropriate and that contribute to the objectives of the Equality Plan. Likewise, the internal communication mechanisms and whistleblowing channels ensure the necessary communication flow both to explain the measures and actions, as well as to collect any complaints and/or allegations regarding equality that may arise.

In relation to universal accessibility, the company strives to go beyond the regulatory framework and this is the context in which the accessibility of the website and the accessibility of the facilities in the Balmes building are framed.



8

Respect for human rights





## Respect for human rights

**The Code of Ethics reflects the organisation's commitment to legality and ethical and upright behaviour.**

Eugin has a **Code of Ethics**, which applies to the entire Group, as one of the key documents reflecting the organisation's commitment to legality and ethical and upright behaviour. Furthermore, corporate values implicitly include compliance with the relevant regulations and respect for human rights.

The company provides its employees, managers, advisors and subsidiaries of the group with a whistle-blowing channel and a queries channel for notifications related to the Code of Ethics.

During the period covered by the Report, Eugin is not aware of any cases of complaints of human rights violations. Eugin also operates a **Compliance Programme** which aims to establish the principles, procedures and tools to manage the legal obligations to which the Group is subject and to mitigate the risks of non-compliance in order to achieve the objectives set out in the Compliance Programme.

The organisation has also carried out **a risk analysis** where it analyses the possible criminal risks, whether in the area of the company's business activity, the activities carried out by management or contracting out to third parties. Likewise, in the management of its supply chain, the company encourages the contracting of local suppliers and has not identified operators and suppliers that pose a significant risk of violating human rights or the provisions of the fundamental conventions of the International Labour Organisation (ILO).

9

Commitment to fight corruption and bribery





## Commitment to fight corruption and bribery

**Eugin operates a compliance programme that sets out the principles, procedures and tools to manage legal obligations and to mitigate the risks of non-compliance.**

The Group's good governance policy is based on four main pillars: the Code of Ethics, the Anti-Bribery Policy, the Crime Prevention Manual and training with the aim of fostering a culture of compliance throughout the organisation.

The Group's Management Committee is directly involved in the implementation of good governance policies, overseeing, through the Compliance Committee, the implementation, supervision and compliance with the laws and regulations of the sector in each of the countries where the Group is present, as well as internal policies and procedures.

### *Measures undertaken to prevent corruption and bribery*

Eugin operates a **compliance programme** based on the implementation of several documents, policies and procedures centred on business ethics, notably the Group's Code of Ethics, the Compliance Framework, the Group's Anti-Bribery Policy, the Whistleblowing Channel and the Compliance Committees in each of the countries where the Group is present, among others. The management of this programme is applicable to all Group entities, both the holding company located in Barcelona (Spain) and its international subsidiaries.

## ETHICS

### Code of Ethics

The company is aware of the importance of ethical values and principles, both in its daily work and in every decision taken in the business sphere, and has therefore formalised its own **Code of Ethics**. This code seeks to promote ethics for the benefit of all the company's partners, and an image of a solid, rigorous and ethically responsible company.

The Code was created with the intention of being a guide and a reference manual that should help the organisation in its day-to-day activities and decisions. It addresses, among other issues, important questions of integrity in conducting business and in dealing with employees, customers, suppliers and partners.

*The Code of Ethics is shared and promoted by the management bodies of all the companies that make up the Group.*

Everyone in the company complies responsibly with the law and is committed to respecting the ethical principles and values set out in the Code of Ethics. Eugin's objective is to act with integrity, not because it is an obligation but as a matter of conviction.

The principles contained in this Code of Ethics are the same for all countries in which EUGIN operates, regardless of local laws, customs and practices, unless the latter are even more rigorous.



# ETHICS

*The Code of Ethics defines the values of the organisation and establishes the following criteria regarding conduct:*

1. Compliance with laws and corporate standards
2. Policy on respect and non-discrimination
3. Conflict of interest
4. Use of insider information
5. Relationship with the professional environment
6. Information protection and confidentiality
7. Protection and proper use of assets
8. Processing of financial information
9. Responsibility towards the environment

The Code of Ethics must be complied with by all EUGIN employees, managers and/or advisors, and the involvement of all of the above is absolutely essential for ensuring that it is applied in each and every one of its activities.

# ÉTICA

*The company provides its employees, managers, advisors and group subsidiaries with the following communication channels related to the Code of Ethics:*

### **Whistle-blowing channel:**

The e-mail address [canaldedenuncias@eugin.es](mailto:canaldedenuncias@eugin.es) is managed by the Human Resources Department and the Internal Audit Department and is the specified confidential means of communication for channelling allegations from Eugin members regarding reasonable indications that acts contrary to the law or the Code of Ethics have been committed.

In this regard, Eugin has an **Internal Whistleblowing Channel Manual** whose purpose is to regulate Eugin's Whistleblowing Channel, as well as its internal and external management and those aspects needed for its correct implementation and operation, in accordance with, and following, the Group's internal regulations.

### **Queries channel**

The e-mail address [compliance@eugin.es](mailto:compliance@eugin.es) is managed by the Compliance Committee and is the specified confidential means of communication for channelling doubts and/or queries from Eugin members regarding reasonable indications of the commission of acts contrary to the law or to this Code.



## Communication and training on anti-corruption policies and procedures

*GRI 205-2*

Another of the tasks of the Compliance Committee, which are conferred by the Board of Directors and are expressly regulated and detailed in the General Section of the Group's Compliance and Criminal Risk Prevention Manual, is that of dissemination and training. The Committee promotes and ensures the training and provision of information to all professionals in matters of criminal risk prevention. To this end, and among other duties, the Compliance Committee must resolve any doubts related to the content, interpretation and application of the **Criminal Risk Prevention Model**, as well as guaranteeing the adoption and effective compliance with the Communication and Training Plan designed for the prevention of criminal risks.

The Group operates in a highly regulated sector and therefore, the Group's entire professional team must be aware of and trained on the Compliance Programme in order to successfully perform their duties and meet their compliance obligations.

### Measures to combat money laundering

The Eugin Group, taking into account its international business and the trading relations it establishes with business partners resident outside Spain, has deemed it appropriate to define and implement a series of rules and procedures aimed at preventing money laundering and the financing of terrorism in order to ensure and maintain zero risk in its operations and to ensure that there is no doubt that it exercises even greater diligence than is required of it, thus fostering a true culture of compliance. In this respect, Eugin provides a **Manual for the prevention of money laundering and the financing of terrorism**, the content of which is regularly updated to include the improvements deemed necessary for its effective implementation.



10

Commitment to society



## Sustainable development

GRI 102-13, 203-1, 413-2

**Eugin is committed to the society in which it operates and to the United Nations 2030 Agenda for Sustainable Development.**

Eugin is committed to the society in which it operates and to the United Nations 2030 Agenda for Sustainable Development, seeking opportunities to promote social, economic and environmental development within the framework of its business activities. The Group's responsibility goes beyond ensuring profitability and generating economic value, by taking into account the fulfilment of the needs and expectations of its stakeholders.

The company has a **significant impact on the surrounding region**, through the development of initiatives that have a positive influence on society and the protection of the environment, as well as contributing to improving the competitiveness of the business community.

The patient is at the heart of Eugin's operations in terms of **relations with local community stakeholders and the methods of dialogue with them**, and external communication is also aimed at prescribers, shareholders and, more generally, the society in which the Company operates. Within the organisation, the appropriate management of internal communication provides a common framework, a certain way of doing things that helps to achieve the individual and collective goals proposed, while improving the coordination of activities and ensuring the fluid exchange of information.

We live in a hyper-connected world, where the formats, both formal and informal channels of communication are evolving rapidly. The **Communication Policy** is one of Eugin's basic pillars and it defines the Group's internal and external communication policy, which is designed to meet the corporate objectives, and identifies the strategy and the use to be made of the various communication channels.

Within the framework of the organisation's relationship with the scientific, medical and academic community, the company has entered into collaboration agreements. As a company dedicated to the assisted reproduction sector, Eugin is linked either institutionally as a company or through its professional staff with the sector's foremost associations.





## Contributions to foundations and non-profit organisations

As part of the promotion of Social Responsibility, and as is customary, Eugin has carried out solidarity initiatives with various foundations and non-profit organisations during the current financial year. The organisation has made financial contributions and sponsorship activities amounting to €4,350, as well as contributions in kind linked to the dissemination of knowledge and donations through the different initiatives.

For their part, EUGIN companies located in Brazil have also carried out initiatives to promote social responsibility and solidarity through alliances with charitable organisations, which offer treatment at cost price to members of these NGOs.

In relation to promoting the integration of people with disabilities, Eugin complies with the General Law on Disability (formerly LISMI) by hiring people with disabilities. In addition, it also promotes the purchase of products and services from companies focused on the occupational integration of people with disabilities.

## Sub-contracting and suppliers

*GRI 102-9, 204-1*

From the Purchasing Department, the company strives to provide added value in a sustainable manner in the continuous optimisation of product and service purchasing processes, while complying with the standards required by the different areas of the organisation, as well as ensuring the achievement of results based on transparency, impartiality and objectivity, and always seeking continuous improvement in close collaboration with suppliers.

Eugin has a **Purchasing and Investment Policy**, applicable to all companies in Spain, which aims to regulate the guidelines to be followed for the company's purchases and investments, regardless of the department where the need for their management arises.



Eugin has a **Supplier Evaluation Procedure** which is designed to record the basic legal and commercial information of potential suppliers, and to ensure that they are aware of the established business policies and requirements for entering into a relationship with Eugin. In addition, it is intended to evaluate a supplier's ability to provide products in compliance with the specifications, policies and business requirements established in accordance with Eugin's needs.

In relation to the authorisation process of a potential supplier, Eugin has a **Request For Information (RFI)** procedure where it collects a series of data on the company, in terms of general information, such as financial, commercial and operational information.

The organisation carries out a **technical evaluation** of suppliers in which the following aspects are considered: compliance with deadlines, responsiveness, defects in the provision of the service and communication capacity.

Every year Eugin carries out this evaluation of the suppliers it works with on a regular basis, which are included in the list of authorised suppliers. The Quality Department is responsible for carrying out this evaluation process, together with the users in each area served by the supplier.

Subsequently, the supplier is informed of the result of this evaluation, depending on whether the score has exceeded expectations or not, and will be asked to respond in order to resolve the causes that have led to the defects in the score obtained, where applicable. This communication will be carried out by the user area of each supplier.

Eugin encourages the positive impact of the performance of its business activities in its area by engaging local suppliers.



## Patients

*GRI 416-1*

The patient is at the heart of Eugin's operations, which is why the company's primary objective is to have the means to meet their demands swiftly, efficiently and responsibly, with clear objectives and goals, a highly qualified team that is constantly trained and brought up to date, cutting-edge technology and standardised processes that are periodically reviewed to establish improvements and promote their evolution according to patients' expectations, scientific and technological possibilities and the legislation in force.

It is precisely this philosophy and the management tools with which it is put into practice that distinguishes Eugin as an organisation with a clear focus on quality and full patient satisfaction. Quality is a common endeavour in all areas of the Group, each of which should be aware that it is a customer and supplier to the others.

For a potential patient, his/her medical treatment is something intangible, an expectation that is difficult to evaluate until it is actually carried out. Therefore, the image conveyed, the sensations and the messages conveyed are the main elements that this person relies on when deciding whether to start treatment with Eugin or to go to another clinic.

The regulations in force governing the area of activity, as well as the wishes and expectations of patients, together with the expertise of the Group's own practitioners, are the criteria for establishing the standard of quality of Eugin's services.





The Eugin Group companies in Spain fulfil their commitment to quality in the **Quality, Environment and Occupational Safety Policy**, which is applied in all phases of their activities: the diagnosis and treatment of sterility, obstetric and gynaecological monitoring, as well as the administrative and support activities required for the above-mentioned activities.

This policy is based on the principle of achieving total quality, by applying continuous improvement in the processes in order to ensure that patients' expectations are met in all services provided.

Among all the advantages of having an **Integrated Management System**, it is worth highlighting the implementation, within the company, of the philosophy of continuous improvement in the services, with the most demanding policies and programmes, which satisfy the needs of the patients and position the company at the highest level of competitiveness. The Eugin Clinic in Barcelona is also a benchmark in the sector as the first assisted reproduction clinic to implement an Integrated Management System for quality, environment and occupational risks. The clinic has ISO 9001/ 2015 quality certification, ISO 14001/2015 environmental certification and OSHAS 18001 occupational health and safety certification. The Integrated Management System is audited both internally and externally once a year.

One of the requirements of the management system is to have a system for measuring patient satisfaction. Eugin carries out satisfaction surveys after the first visit and after the technique has been performed. The data obtained from these surveys, as well as the comments and suggestions received from patients, are analysed and evaluated every six months (monthly at the Eugin Clinic in Barcelona) using the Net Promoter Score (NPS) tool, which measures customer satisfaction by means of a questionnaire and provides the organisation with information to determine whether the customers' experience with the brand was good and, therefore, whether they would recommend it to others. On the other hand, suggestions and comments from patients are also collected through social media.



Eugin also has a **Procedure for patients' complaints and suggestions** which aims to describe the procedure for receiving, dealing with and resolving complaints and suggestions expressed by patients in order to take corrective and preventive action and improve the services provided. In this regard, in 2020 the Eugin Clinic in Barcelona has implemented the figure of the Patient Experience Manager who monitors compliance with this protocol and meets weekly with the Management to resolve incidents by dealing directly with patients. These procedures and their quantitative analysis are periodically presented to the Quality Committees.

In relation to the measures applied by the organisation to guarantee the health and safety of patients, a specific protocol has been established in this regard within the context of COVID-19.

## Tax information

*GRI 201-4, 207-4*

Thanks to the economic business activity that the Group generates in the countries in which it operates, it takes part in tax collection, through taxes borne and collected both directly and indirectly.



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