

Introduction

Corruption and bribery represent some of the most severe and complex challenges faced in modern business environments globally. These practices threaten sound corporate governance and management, undermine economic and social development, and distort free competition. Similarly, conflicts of interest pose a distinct challenge to any organization. All the aforementioned practices are forms of the same underlying misconduct—namely, adopting behaviors that run contrary to the core ethical business standards that must govern commercial activity; standards that the Company has strictly committed to follow unwaveringly.

In the broader healthcare services sector, the requirements to prevent corruption, bribery, and conflicts of interest—and, correspondingly, to operate with absolute integrity and transparency—are significantly heightened, affecting every aspect of the operations of entities active in this field.

Recognizing the critical importance of countering such behaviors, practices, and conduct, and wishing to demonstrate its non-negotiable commitment to zero tolerance, the Company has established this anti-corruption and anti-bribery policy (the "Policy").

In this exact spirit, the Company ensures that all employees are fully aware of their inalienable and unquestionable right to report such practices and conduct, and that at every instance where they do so, they shall be assured the full support from the Company.

Scope of Application

This Policy applies to:

- All employees and associates of the Company, regardless of position.
- Members of the Company's Management.
- Any third party acting on behalf of the Company in any capacity including, but not limited to, professional advisors, agents, and subcontractors.

(The aforementioned persons are hereinafter collectively referred to as the "Addressees").

Definitions

For the purposes of this Policy, the following definitions shall apply:

Corruption: The abuse of power, position, or capacity for personal gain (monetary and/or non-monetary). This includes, without limitation, active and passive bribery, extortion, nepotism, embezzlement, and conflicts of interest.

Bribery (Active & Passive): Any form of promise, provision, offer, or acceptance, whether direct or indirect, to or from any individual employed in the public and/or private sector, of advantages of any nature for themselves or a third party, intended to induce an action or omission in violation or abuse of their duties. The concept of bribery also encompasses facilitation payments—meaning payments made to process, facilitate, or expedite procedures and/or routine services to which the Company or the Addressees are otherwise legally entitled.

Conflict of Interest: Circumstances in which an Addressee prioritizes personal interests over professional duties, their duty of loyalty to the Company, and/or the Company's legitimate interests. This includes any professional or personal situation that could potentially unduly influence or compromise an individual's ability to assess a situation or decide independently and impartially, thereby potentially prejudicing the Company's interests.

Company's Commitments – Purpose of the Policy

The Company maintains a strict zero-tolerance policy against any practice of corruption, bribery, and conflict of interest. In this context, the Company:

- Strictly and unequivocally condemns all forms of bribery and corruption.
- Explicitly prohibits any conduct by Addressees that, even indirectly, falls under the definition of corruption and/or bribery.
- Strictly prohibits any conduct by Addressees that constitutes a conflict of interest.

In view of these commitments, the purpose of this Policy is to:

- Ensure compliance by Addressees with the applicable statutory and regulatory framework regarding anti-bribery measures.
- Establish clear principles and rules to prevent, deter, report, and combat bribery and corruption in the Company's dealings with private individuals, public officials, and any third-party natural or legal person, entity, or authority.

Areas of Application & Standards of Conduct

Set forth below is a summary of common situations the Company may encounter, along with mandatory guidelines on how to act:

Third Parties: The Company may be held liable for acts of corruption and bribery committed by third parties performing work on its behalf. Prior to entering into a collaboration or executing a contract with any third party, and in accordance with due diligence procedures, the competent Company representative must verify and ensure

that the reputation, standing, and capabilities of the specific party are satisfactory, and that the partnership does not place the Company at risk.

Anti-Money Laundering: The Company is committed to effectively combating the laundering of proceeds derived from illegal or criminal activities. To address such risks, the Company implements appropriate measures regarding both the screening of third parties with whom it cooperates and transacts, and the continuous training of personnel for the prevention of such practices.

Political Contributions and Donations: No contribution, donation, financial assistance, or other form of support or facility to political parties, movements, organizations, party representatives, state officials, candidates for public office, or other politically exposed persons is permitted. If Addressees make personal political contributions as permitted by law (on their own behalf and out of their own funds), such contributions must not be intended to influence a third party for the Company's benefit, nor should they create any impression that they are connected directly or indirectly to the Company.

Charitable Donations and Sponsorships: Within the framework of corporate social responsibility, the Company may, under specific circumstances and solely upon prior approval by Management, make charitable donations for public benefit or sponsor educational initiatives related to its field. In line with third-party due diligence procedures, the Company must ensure that the recipient organization's activities, reputation, and standing are satisfactory, and that any donation or sponsorship does not expose the Company to risk. Furthermore, all transparency requirements regarding the effective use of resources allocated for donations or sponsorships must be met, and under no circumstances may any donation or sponsorship aim to obtain an undue benefit.

Gifts and Hospitality: Offering or accepting low-value, non-monetary corporate gifts and hospitality is permitted solely within the bounds of customary social courtesy and business practice. Under no circumstances should these be intended—or appear to be intended—to obtain an undue advantage through influencing any act or omission.

Misuse of Relationship with the Company: Any of the following circumstances, including but not limited to, constitute an abuse of the Addressee's relationship with the Company and are strictly prohibited:

- Maintaining personal or financial relationships with any third party conducting business with the Company, provided that the Addressee has control or influence over that relationship.
- Using information developed by or disclosed to the Addressee in the course of their relationship with the Company for personal gain, including the benefit of family members, close associates, or related parties. This covers confidential or financial information, as well as intellectual and industrial property rights belonging to the Company.

Anti-Corruption, Anti-Bribery, and Conflict of Interest Management System

The Company develops, implements, and maintains an Anti-Corruption, Anti-Bribery, and Conflict of Interest Management System, adhering to the following commitments:

- Strict compliance with the legal framework governing corruption and bribery across all Company activities.
- Implementing all appropriate preventative measures to identify and manage the relevant risks associated with its operations.
- Raising awareness among personnel regarding corruption and bribery practices, with the aim of fostering a strong culture of compliance.

- Providing continuous training and education to personnel, ensuring they understand the importance of these policies and procedures in order to foster an organizational culture that rejects corruption and bribery, and effectively addresses conflicts of interest.

Ethics & Compliance Designee

The Company shall appoint an Ethics & Compliance Designee and communicate their contact details to all personnel.

- The Company encourages personnel to seek clarifications, or report matters to the Ethics & Compliance Designee regarding:
 - ✓ Corruption and bribery
 - ✓ Conflicts of interest
 - ✓ Any other unlawful acts that may result in similar consequences
 - ✓ Breaches of ethical rules by which the Company is bound
- Independence of the Ethics & Compliance Designee:
 - ✓ The Ethics & Compliance Designee reports directly to Management regarding any potential violations of this Policy that come to their attention.
 - ✓ The Ethics & Compliance Designee is authorized to make recommendations to Management for the effective implementation, optimization, or amendment of this Policy.

Violations, Reports and Communication

- The Company encourages executives, employees, and associates to immediately disclose all cases of potential corruption, bribery, or conflicts of interest.
- Addressees may refrain from performing work or providing services if there are suspicions of deviations from the principles of this Policy.
- Appropriate measures under applicable provisions will be taken against anyone who commits, or intentionally conceals, instances of corruption, bribery, or acts involving conflicts of interest. Any such measures will be evaluated based on the severity of the violation, in accordance with the principle of proportionality.
- For any questions or doubts regarding compliance with this Policy, the Addressee may consult the Company's Ethics & Compliance Designee.

Whistleblowing and Complaint Review Procedure

- The Ethics & Compliance Designee is responsible for receiving, reviewing, and managing all complaints regarding violations of this Policy. Addressees may contact the Ethics & Compliance Designee during working hours via email, telephone, or by scheduling a meeting.

- If a complaint is deemed well-founded by the Ethics & Compliance Designee, the Management shall be informed immediately so that necessary corrective measures can be taken.
- The Company ensures that all communication channels used for whistleblowing are secure and prevent information leaks. Strict confidentiality is maintained, fully protecting any Personal Data collected within the framework of the procedures above.
- The Company and the Ethics & Compliance Designee commit to receiving, investigating, and managing every report promptly, investigating and examining the allegations impartially, and taking immediate measures at their discretion.
- The Company is committed to ensuring that no form of retaliation or other adverse treatment is taken against any whistleblower.

Validity

This Policy shall remain effective and applicable until replaced by an updated version. This Policy is communicated to all Company employees.

Version History

Version	Summary of Major Changes
v.01	N/A (First Issue)