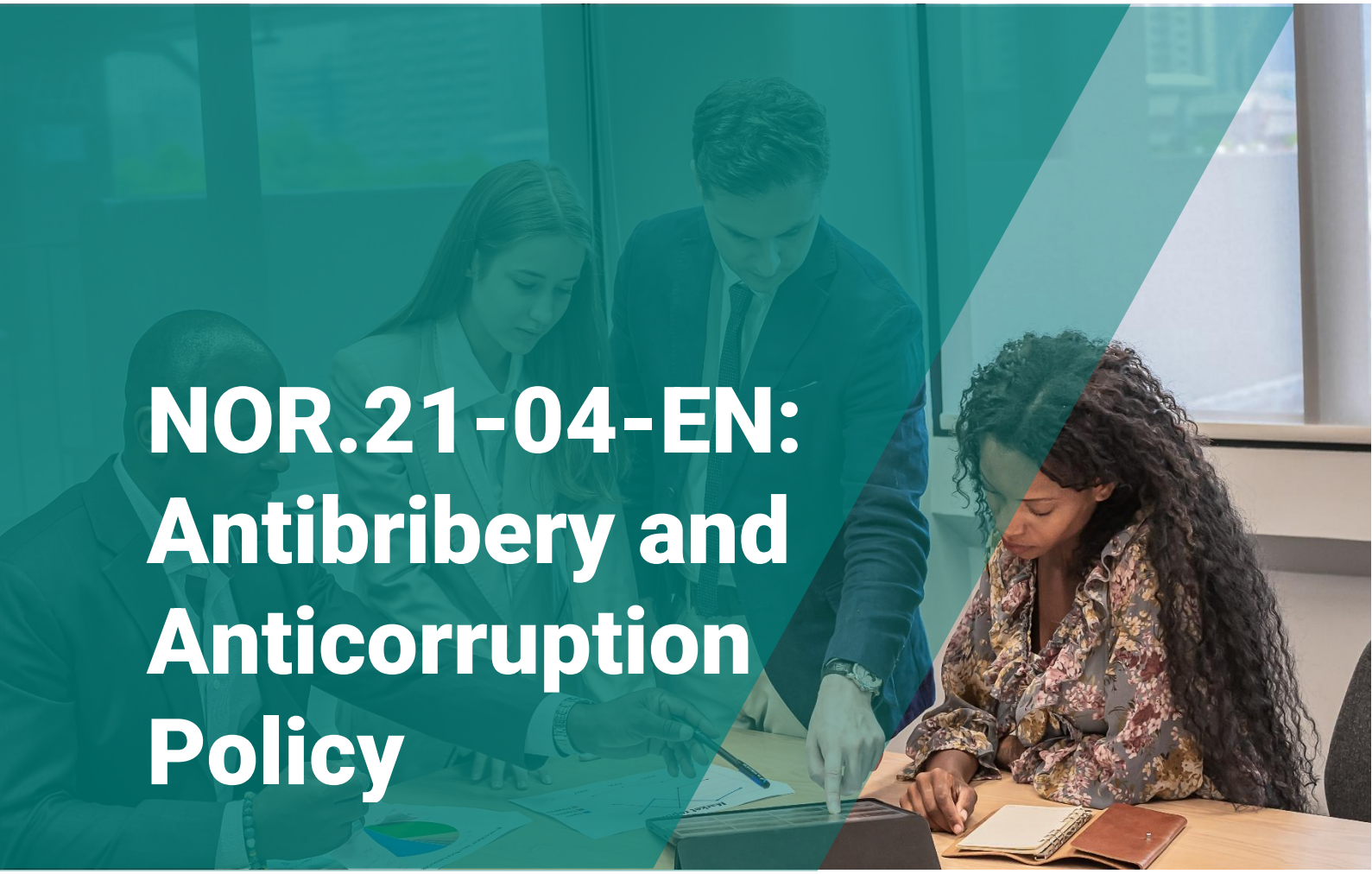
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NOR.21-04-EN: Antibribery and Anticorruption Policy

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I. Purpose and scope of the Policy

1.1 Object

The entities that make up the Palex Group (hereinafter referred to jointly as Palex or the company) maintain a zero-tolerance policy toward any form of bribery or corruption. To this end, Palex has implemented and is continuously developing a Compliance System aligned with the ISO 37001 standard for Anti-Bribery Management Systems.

The purpose of this Antibribery and Anticorruption Policy is to demonstrate Palex's firm commitment to compliance with antibribery and anticorruption regulations and to establish general guidelines for action to prevent any type of corrupt practice.

1.2 Doubts and interpretation

Any questions regarding the scope or application of the provisions set forth in this Policy should be immediately raised to the Compliance Department, which will resolve and interpret the rule.

The Antibribery and Anticorruption Policy should be understood without prejudice to other more specific regulations that develop it, taking into consideration the specific regulated sectors in which Palex operates.

1.3 Scope

The Antibribery and Anticorruption Policy applies to all Palex members, regardless of their title, position, contractual arrangement, or workplace. This Policy may also be extended to certain third parties.

The Antibribery and Anticorruption Policy applies to all Palex entities, regardless of their activity or location.

Likewise, this Policy is applicable to all Palex activities, in accordance with the scope of the Compliance System, defined in NOR.21-03-EN: Compliance Policy.

II. Definitions

Below is a definition of various basic concepts in antibribery and anticorruption matters, which are necessary for the correct interpretation of this Policy:

2.1 Concept of bribery and corruption

Bribery can be defined as offering or giving an undue benefit or advantage to public officials or authorities to carry out (or to not carry out) certain acts or decisions, or simply because of their position. It may also take the form of undue influence, unlawfully using a personal relationship with a public official or authority to secure a favourable decision.

Corruption can be defined as the breach of a duty derived from a specific function or position in exchange for a benefit or advantage of any kind to which one is not entitled, in

the context of private business relations. That is, an unjustified act in exchange for an undue benefit or advantage. In particular, offering, delivering, receiving or accepting an undue benefit or advantage (or simply its promise) as consideration for unduly favouring another in a private business relationship.

In addition, these conducts can also cover other malpractices such as embezzlement or fraud.

2.2 Concept of authority and public official

Anyone who, by law, by election or by appointment of a competent authority, participates in the exercise of public functions is considered an authority or public official.

For example, members of parliament, mayors, councillors, political appointees, career civil servants, interim staff or employees of public sector entities, judges, prosecutors, members of public agencies or bodies, etc.

For these purposes, health professionals, executives, managers, purchasing managers, and other personnel associated with public hospitals, public clinics, and other public entities may be considered public officials or authorities.

2.3 Concept of conflict of interest

A conflict of interest arises when personal or professional interests may interfere with decision-making, compromising impartiality or independence.

The following, amongst others, are considered to be potential conflicts of interest::

- Having family or financial ties with clients, suppliers or other companies or organisations in the sectors in which Palex operates (competitors, regulatory bodies, agents or sub-distributors).
- Having worked in the last two (2) years for a company that is a supplier or client of Palex.
- Having family ties with another Palex employee or with a candidate in a recruitment process.

2.4 Concept of undue benefit or advantage

Any remuneration or compensation of any kind to which one is not entitled or which cannot be duly justified. For example: (i) Money or easily liquidated goods; (ii) Payments in kind; (iii) Covering expenses (medical, educational, leisure, etc.); (iv) Sponsorships or donations; (v) Jobs, contracts, or investments.

III. General principles and guidelines

3.1 Prohibition of corrupt practices

Palex does not tolerate any type of corrupt practice, whether in the public or private sectors, in any type or form. In particular, the following are expressly prohibited:

- Offering or providing payments, compensation, or any other type of unjustified remuneration or influence, including facilitation payments[1], to any person involved in public service in the context of contracting with or distributing to public sector entities, in the application for public subsidies, licenses, or authorizations, or in other contacts with public entities.

- Making cash payments in the course of dealings with the public sector or participating in such dealings if there is a conflict of interest.

- Promising, offering, receiving, requesting, or accepting an undue benefit or advantage to gain favour in any private contractual or commercial relationship.

The above conducts are prohibited whether carried out by a Palex member or through an intermediary person or company.

3.2 Managing conflicts of interest

Every action, decision, or strategy developed within the framework of Palex's activities must be carried out in the best interest of the company, so any conflict of interest must be avoided. However, there are scenarios in which these situations cannot be avoided. In these cases, this process must be followed:

- **Identify**: Palex members must identify any conflicts of interest they may encounter in the course of their corporate activities.

- **Report**: When a conflict of interest is identified, the affected Palex member must notify the Compliance Department in writing through the Register for conflicts of interest available in the Compliance section of the Palex Group SharePoint or, alternatively, through the Ethics Channel or to the email address compliance@palexhealth.com.

- **Refrain from participating**: as a general rule, the person affected by the conflict of interest situation must refrain from participating in or influencing it.

Any reported conflicts of interest will be handled by the Compliance Department and, where necessary, by Human Resources and the Management at local or corporate level.

Disclosing conflicts of interest is part of the employment obligations of Palex members.

IV. Gifts and invitations

The general rule is that the giving and acceptance of gifts and invitations to/from third parties should be limited.

Any gift or invitation offered, delivered, or accepted must comply with the following general principles:

- They must be considered socially appropriate.

- They must comply with the applicable laws and practices.

[1]Facilitation payments are small payments made to a public official or authority to secure or expedite a process or decision to which one is entitled.

- They should not be offered or accepted in the form of bribes, nor should any type of improper payment or commission be concealed.

- They must not be used to improperly induce another party to contract, use, recommend, prescribe, or supply Palex products or solutions.

- They must not give the impression, or create an implied obligation, that the person offering them is entitled to preferential treatment, or to be granted contracts, better prices, or more favourable terms of sale.

- They must occur in an environment appropriate for business.

- Invitations should always comply with the applicable laws and regulations and Palex's internal policies on invitations and expenses.

- Gifts should always have negligible value and may not consist of cash or cash equivalents.

These general principles shall be understood without prejudice to the specific internal regulations on interactions with Healthcare Professionals and Organizations. In particular, only promotional gifts and educational items may be offered to such parties, and solely within the limits set out in those regulations.

V. The Compliance System

5.1 Objectives of the Compliance System

The Antibribery and Anticorruption Policy is part of the Palex Compliance System, which pursues general strategic and ongoing objectives. These include, among others, the following:

- Compliance with applicable regulations such as anti-corruption regulations, self-regulations, relevant sector resolutions and other commitments and obligations assumed by the company.

- Promotion of a corporate culture of compliance and zero tolerance for any form of illicit conduct, including corruption.

- Continuous review, evaluation and improvement of the Compliance System.

These objectives, among others, constitute the framework for the subsequent definition of specific goals, indicators, and concrete actions. For more information on Compliance objectives, you can access NOR.21-03-EN: Compliance Policy.

5.2 Palex Compliance Function

Palex has a Corporate Compliance Officer, a Compliance Department, and may, where appropriate, have Compliance delegates. These figures jointly comprise the Compliance Function. This is without prejudice to the Compliance responsibilities and duties that may be assigned or delegated to other individuals or bodies within the company.

In order to carry out its functions, the Compliance Function has been provided with: (i)

Independence; (ii) Direct and immediate access to the respective Governing Body and Senior Management; (iii) Adequate competence and resources.

For more information on the Compliance Function, you can access NOR.21-03-EN: Compliance Policy.

5.3 Ethics Channel

Those who become aware of any fact that may constitute a breach of this Policy must report it as soon as possible through the Ethics Channel, the secure and confidential communication channel provided by Palex, available via the following link: www.compliance.palexhealth.com

Palex guarantees the utmost confidentiality in the management and processing of any communications it may receive in this regard. Furthermore, communications can be made completely anonymously.

No retaliation or negative consequences will be imposed on the person who reports a potential breach simply for making the communication. The Ethics Channel must not be used to submit knowingly false, malicious or frivolous reports. Abuse of the Ethics Channel may result in disciplinary actions.

More information regarding rights, guarantees, and the operation of the Ethics Channel can be accessed through the NOR.21-01.05-EN: Ethics Channel Policy.

5.4 Consequences of non-compliance

Failure to comply with applicable regulations, the Code of Ethics, the Antibribery and Anticorruption Policy, and other regulations comprising the Compliance System may be subject to sanctions, depending on the severity and repetition of the violation, in accordance with current labour or commercial regulations and without prejudice to any criminal penalties or civil claims that may apply.

Version	Date	Description of the modification
1	04/04/2024	Initial version of the document.
2	17/09/2025	Alignment with ISO 37001 standard and improvement of the scope, objectives and definition of the Compliance Function and other minor modifications.
3	15/10/2025	Minor adjustments aimed at facilitating the international application of this Policy.
4	23/06/2026	Changes relating to the management of conflicts of interest and the Ethics Channel.