



ANTI-BRIBERY POLICY

MedLife Group

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1 INTRODUCTION

This Anti-Bribery (hereinafter referred to as the "Policy") applies to all employees (as defined) and representatives of the MEDLIFE Group (hereinafter referred to as the "MEDLIFE Group" or "the Company").

The Policy will be reviewed whenever necessary, including in the event of relevant legislative, operational or organizational changes.

2 PURPOSE AND SCOPE

This Policy supplements and expands upon the provisions of the MEDLIFE Group Code of Ethical Conduct ("Code of Conduct").

The purpose of this Policy is to establish the rules applicable within the MEDLIFE Group for the prevention of bribery in all activities carried out by the Company.

This Policy is binding on every company within the MEDLIFE Group, on all its employees (as defined below) and on all its representatives.

MEDLIFE Group may, where appropriate, use various representatives to provide various services. As the company may be held liable for their non-compliant actions, their selection, assessment and engagement must be carried out with due care and exclusively for legitimate commercial purposes. The contractual relationship between the MEDLIFE Group and any of its representatives must be formalized in writing. The commercial representative must be informed that MEDLIFE Group applies high ethical standards and fully complies with applicable legislation, and that MEDLIFE Group's standard anti-bribery clauses will be included in written agreements. Persons acting for or on behalf of MEDLIFE Group must comply with the Code of Conduct, this Policy and applicable legislation.

3 WHAT IS BRIBERY AND WHAT IS PROHIBITED?

MEDLIFE Group prohibits bribery, as defined below, in any form and in all its business activities and relationships. The company is committed to conducting its business to the highest ethical standards and in full compliance with applicable legislation, and would rather forgo a business opportunity than obtain it through illegal means.

Consequently, MEDLIFE Group does not tolerate any form of bribery and prohibits all its employees and representatives from offering or accepting bribes.

For the purposes of this Policy, 'bribe' means the granting, promise, offering, authorization,

or making available (active bribery) or, for oneself or for another, the receiving, accepting of a promise or soliciting (passive bribery) of an undue advantage in exchange for a decision, action, favor, benefit or advantage related to the performance of the recipient's duties.

<p><i>The undue advantage</i> may have an obvious monetary value (cash, gifts, gift cards, invitations, discounts, services in kind) or a less directly quantifiable value (sponsorships, charitable donations, offers of employment or internships), granted to the recipient or to a person affiliated with them. It is not necessary for the advantage to actually influence the recipient's behavior.</p>	<p><i>Trafficking in influence</i> — namely the offering, promise, authorization or granting (or the receiving, accepting or soliciting) of an undue advantage to influence a decision or action by another person in the exercise of a public function or in the context of public procurement — constitutes a form of bribery and is prohibited.</p>
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It is also prohibited to offer money or other benefits to a person representing MEDLIFE Group (for example, an employee or representative) in a manner that, whether intentionally or through gross negligence, facilitates bribery or influence peddling (negligent financing of bribery).

Legal definitions of bribery may vary between jurisdictions, but the principles set out remain generally applicable. Where there are differences between local legislation and the provisions of this Policy or the Code of Conduct, the stricter provisions shall prevail.

4 ENTERTAINMENT AND GIFTS (GIVEN OR RECEIVED)

MEDLIFE Group occasionally incurs modest expenses for entertainment and gifts for professional purposes. In certain situations, the company may cover travel costs (transport, meals, accommodation) for individuals who are not MEDLIFE Group employees.

Entertainment and gifts, whether given or received, must be of moderate value, comply with the financial limits set by law, serve a legitimate business purpose, be reasonable and properly documented in line with the Group's existing policies or procedures.

Accepting gifts is permitted only in exceptional circumstances.

The following may be considered:

- gifts of modest value offered to several people;
- small symbolic tokens;
- flowers or simple gifts offered in accordance with social customs, within reasonable limits.

Expenditure involving public officials must be strictly monitored.

All expenses, including those for meals, entertainment, travel and gifts, must be recorded promptly and accurately, in accordance with applicable accounting policies. Documentation must include the business purpose, cost, recipients and other relevant information, as well as detailed receipts.

Gifts or invitations must not be offered to secure a particular transaction or decision. Similarly, they must not be accepted if there is, or may be, an expectation of a quid pro quo.

5 TRADE DISCOUNTS, REBATES, COMMISSIONS AND BONUSES

Excessive discounts or compensation schemes may be used to facilitate bribery.

MEDLIFE Group may grant favorable commercial terms, including discounts or rebates, either directly or through a representative. Commissions or bonuses may also be paid for legitimate services that have actually been provided and documented, in compliance with applicable legislation. All such agreements must be in writing, commercially justified and in accordance with the law.

6 POLITICAL AND CHARITABLE CONTRIBUTIONS

MEDLIFE Group does not make political donations. Individual involvement in political activities must not use MEDLIFE Group's resources or name.

The company may support charitable organizations for legitimate purposes, for the benefit of society and in the spirit of social responsibility. Donations may not be conditional, either explicitly or implicitly, on the purchase of MEDLIFE Group products or services.

7 FACILITATION PAYMENTS

MEDLIFE Group prohibits the facilitation payments, i.e. small payments to public officials to expedite routine administrative formalities. Official, documented fees paid to public authorities (e.g. licensing fees) are not considered facilitation payments.

If you are asked to make such a payment, consult your line manager or the HR/Legal department.

8 DUE DILIGENCE

Risk assessments (due diligence) must be carried out periodically to identify and prevent bribery risks associated with certain countries or business partners. The findings must be rigorously documented.

Managers must identify high-risk areas, such as interactions with public officials or contracts with state-owned entities.

Due diligence analyses must be proportionate to the identified risks and repeated if the relationship is long-term or relevant changes occur.

Warning signs ('red flags') must be investigated, and the necessary measures taken to reduce or eliminate risks.

Partners must be informed of the Policy and, where appropriate, contractually obliged to comply with it and provide anti-bribery guarantees.

9 MERGERS AND ACQUISITIONS

In all Mergers & Acquisitions transactions, compliance with anti-bribery rules must be assessed. Specific clauses must be included in the due diligence analysis. Any indication of bribery constitutes a "red flag" and requires remedial or risk mitigation measures, including appropriate contractual provisions.

10 RESPONSIBILITIES

Managers at all levels must ensure the implementation of the Policy and that employees are informed.

The Chief Executive Officer is responsible for enforcing the Policy with the support of the HR/Legal Departments and the Ethics Officer, who must implement appropriate procedures. A list of the individuals and departments most exposed to this risk must be maintained by the HR Department / Ethics Officer.

Each manager must ensure that their team is aware of, understands and complies with the Policy.

Every employee is obliged to read and comply with the Policy and applicable legislation, and to report any known or suspected breaches.

11 CONSEQUENCES OF BREACHES

MEDLIFE Group applies a zero-tolerance policy.

Violations may result in severe penalties for the company and individuals, including fines and imprisonment. Participation in violations may lead to disciplinary action, including dismissal and referral to the relevant authorities.

12 DUTY TO REPORT

Any actual or potential breach must be reported promptly to the manager, the HR/Legal department or the Ethics Officer via the whistleblowing mechanism set out in the Whistleblower Policy.

Reports can also be submitted anonymously via the whistleblowing mechanism. However, providing contact details facilitates the investigation.

Retaliation against individuals who, in good faith, report or participate in investigations is prohibited. Any retaliation may result in disciplinary action, including dismissal.

13 ANTI-BRIBERY TRAINING

The Group's Legal Department, through the Ethics Officer, provides the necessary training on anti-bribery policy and legislation. Training must be provided at least once every three years for all staff and departments identified as high-risk. The training must:

- provide sufficient knowledge of the Policy and legislation;
- clarify the situations in which it is necessary to consult the manager or HR/Legal;
- highlight the disciplinary and criminal consequences;
- be repeated periodically for updating and refresher purposes.

Definitions

For the purposes of this Policy:

Representatives include agents, brokers, intermediaries, representatives, contractors, consultants, lobbyists, service providers and any other person employed or authorised to act for or on behalf of the MEDLIFE Group (a) in sales, service provision or business development activities or in dealings with public authorities.

Employee means any person who carries out activities for or provides services to a MEDLIFE Group company, under an individual employment contract or as a self-employed person or under a similar contractual arrangement. The term also includes members of the board of directors, the management team, supervisory bodies and other corporate structures within the MEDLIFE Group.

Public authorities mean any official or employee of the public administration, of a political party, a representative of a political party or a political candidate, as well as any person acting for or on behalf of them, in any country. The term includes any person who:

- exercises legislative, regulatory, supervisory or judicial functions;
- is a director, official, employee or acts on behalf of an entity owned or controlled by the state or with governmental functions;
- is an official or employee of an international public organization

ANNEX

Commitment

I, the undersigned, declare that I have received and read the MEDLIFE Group Anti-Bribery Policy and agree to comply with its provisions and the statements below.

- I understand that MEDLIFE Group is committed to upholding the highest ethical standards and complying with all applicable laws in its conduct. I understand that the MEDLIFE Group would rather lose a business opportunity than obtain it unlawfully.
- I am not aware of any unreported, actual or potential breach of MEDLIFE Group Anti-Bribery Policy or applicable anti-bribery legislation.
- I will immediately report any actual or potential violation of MEDLIFE Group Anti-Bribery Policy or applicable anti-bribery legislation.
- If I am in a leadership position, I will inform my team about MEDLIFE Group Anti-Bribery Policy, arrange for team members to be trained on this Policy, and ensure that they agree to comply with it.

I, the undersigned, agree with the above statements.

Date / signature
