

Compliance and corruption prevention Policy

Table of Contents

1. Introduction	2
2. Purpose and Objectives	2
3. Scope of Application	2
4. Fundamental principles.....	2
5. Commitment of Top Management	3
6. Communication and Reporting Channels.....	3
7. Identification and Risk Assessment.....	4
8. Training and Awareness Raising	4
9. Monitoring, Review, and Continuous Improvement	4
10. Compliance function and compliance function for the prevention of corruption	4
11. Penalties and Consequences.....	4
12. Liability	5

1. Introduction

Palex Healthcare Group Italia S.p.A. (hereinafter also referred to as Palex HGI) is committed to promoting a culture based on integrity, legality and compliance with regulations.

With this document of the Compliance and Corruption Prevention Policy (hereinafter the Policy), drawn up at the end of a careful analysis of the organizational context of reference and only after sharing and establishing what the purposes of the Palex Italia group are, the fundamental principles and objectives of the Compliance and Corruption Prevention Management System of the Palex Italia group are defined. In line with ISO 37301 and ISO 37001, and guidelines and minimum requirements of conduct are established, both at individual and organizational level, with the aim of

- ensure that all business activities are carried out in compliance with applicable regulations and the highest ethical standards.
- promote a corporate culture based on integrity, transparency and compliance with applicable anti-corruption regulations.
- strongly reiterate that the Palex Italia group prohibits and strongly condemns any act of corruption.

This Policy is an integral part of a broader system of business ethics and internal control, aimed at ensuring compliance with national and international regulations and standards and protecting the company's reputation. It contributes to increasing the general degree of compliance with applicable laws, regulations and international good practices, in order to concretely implement a corporate culture inspired by the value of honesty, ethically correct behaviour, and the prevention and fight against corruption

2. Purpose and Objectives

Palex HGI's Compliance and Anti-Corruption Management System aims to:

- Ensure compliance with applicable laws, regulations, rules and codes of conduct, including and especially with regard to corruption
- Reduce the risk of non-compliance and promote accountability and transparency in all operational areas.
- Foster a company culture that encourages employees to make ethical decisions and comply with regulations, as well as to report any violations of those regulations

3. Scope of Application

This policy applies to all Palex HGI personnel (e.g. employees, managers, executives and members of the Board of Directors), as well as all Business Partners (e.g. agents, consultants, suppliers, business partners and third parties known as "Business Partners") who work with Palex HGI companies.

Any person who performs activities on behalf of Palex HGI is required to read and understand the contents of this Policy and to conduct themselves in accordance with this Policy.

4. Fundamental principles

Palex HGI staff, in carrying out their activities, adheres to the following ethical principles:

- **Legality and fairness:** Operating in full compliance with all applicable laws and regulations in the countries in which we operate.

- **Integrity, clarity and transparency:** By adopting ethical, transparent and responsible behavior.
- **Impartiality and fairness:** Ensuring that all actions and decisions are taken fairly and without bias.

In particular, in business relationships and relationships, behaviors and practices that may even appear illegal or collusive, payments that may appear illegal, attempts at corruption and favoritism, direct or indirect solicitations of personal and career advantages for oneself or for others and more generally acts contrary to applicable laws and regulations are prohibited.

5. Commitment of Top Management

Palex HGI's top management is committed to ensuring an adequate internal control system and to guiding the entire organization in achieving the performance required for the prevention of corruption in accordance with the following guidelines:

- provide adequate resources to support the Compliance and Anti-Corruption Management System, in order to meet the requirements of the relevant system
- guarantee a continuous commitment to conduct its activities in full compliance with regulatory obligations, constantly verifying the correct and adequate application of the rules on the fight against corruption and the requirements of the anti-corruption management system and the compliance system;
- regularly monitor the effectiveness of the system and ensure continuous improvement of the compliance management system and for the prevention of corruption;
- prohibit all forms of corruption and indeed encourage employees to report suspicions in good faith without fear of retaliation and consider transparency and legality an added value, integrating into its processes the controls and improvement actions necessary to manage the prevention of corruption;
- take appropriate disciplinary or legal action against individuals who have engaged in unlawful conduct contrary to the principles of this policy.

These guidelines are translated into operational objectives defined in a specific document, constantly monitored during the Review of the Top Management and communicated to the entire organization in the appropriate means and channels.

6. Communication and Reporting Channels

of Palex HGI considers the reporting tool effective in combating corruption, and for this reason encourages reports, even anonymously, of alleged corruption through a "whistleblowing" procedure that governs the management and verification of reports, to guarantee the confidentiality of the content of the reports, the identity of the whistleblower and the reported person and to protect the whistleblower from any discrimination or retaliation

For all details on how to report, please refer to the Whistleblowing Policy published on the company website.

7. Identification and Risk Assessment

Palex HGI's Compliance function carries out a periodic assessment of the risks of non-compliance and corruption, in order to be able to identify and mitigate any critical issues in a timely manner. All business processes are analyzed to identify specific risks and develop preventive and corrective measures.

8. Training and Awareness Raising

Palex HGI is committed to providing periodic and regular training to employees on relevant regulations, code of ethics, and compliance and anti-corruption responsibilities, with the aim of making all personnel understand what the inherent obligations are, and developing and increasing the sharing of corporate values.

9. Monitoring, Review, and Continuous Improvement

Palex HGI is committed to continuously improving its Corruption Prevention Management System

For this reason, the compliance and anti-corruption management system is periodically monitored and evaluated to ensure its effectiveness and compliance with corporate and regulatory needs. Any area for improvement is identified and integrated to optimize the system.

10. Compliance function and compliance function for the prevention of corruption

Palex HGI guarantees the authority (defined through the responsibilities attributed to the function and made known to all company personnel) and the independence of the Compliance Function and the Compliance Function for the prevention of corruption, appointed by the Management Body.

Within Palex HGI, the compliance function for the prevention of corruption is covered by a member of the compliance office.

The compliance function is granted direct access to the Governing Body and is allocated its own expenditure budget annually.

The objective of the compliance function is to ensure that all Palex HGI companies, through the work of their personnel, comply with the applicable regulations, intercepting any risks in this regard in advance and mitigating the consequences in the event of any violations.

This function is exercised through the periodic review of the risks related to the activities of all the companies of the group, the constant monitoring of regulatory and legislative updates, the management and application of the corporate compliance and anti-corruption system, the provision of periodic training to all the personnel of the Palex Italia group and, in any case, through all those activities deemed necessary to ensure full compliance with the companies of Palex HGI to all applicable regulations.

11. Penalties and Consequences

Those who work in the name and on behalf of Palex HGI are aware that in the event of corrupt behavior and violation of the Law on corruption, as well as in violation of any applicable legislation, they will incur offenses punishable not only on a criminal and administrative level, but also on a corporate disciplinary level.

Palex HGI requires its "Business Partners" (also referred to as Business Partners) to comply with applicable laws, the code of ethics and this Policy, based on clauses whose non-compliance implies the termination of the contract.

For employees, any violations of this Compliance and Anti-Corruption Policy may result in disciplinary action, in line with applicable legislation and internal regulations.

Zero tolerance towards non-compliant behavior is one of the fundamental principles of Palex HGI's policy.

12. Liability

All employees and collaborators are responsible for adhering to the principles and directives of this policy and for reporting any non-conformities. The Top Management, Management and Compliance Team led by the Compliance function for the prevention of corruption ensure the supervision and management of all activities related to the compliance and anti-corruption management system.

Palex HGI gives this Policy maximum dissemination, ensuring that it is understood and implemented by all employees and known to all potential "Business Partners"; for this purpose it is made available on the Company's website.

Elaborated by: Top Management

Approved by: Board of Directors of all the companies of the Palex Healthcare Group Italia S.p.A.