

Anti-Corruption and Anti-Bribery Policy

No. POL-CNO-012-00

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	2 of 10

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	3 of 10

TABLE OF CONTENTS	PAGE
TABLE OF CONTENTS	3
1. INTRODUCTION	4
2. SCOPE	4
3. OBJECTIVES	5
4. CONTENT	5
5. SANCTIONS	7
6. RESPONSIBILITIES	7
7. REFERENCES	7
8. REVISION HISTORY	8
9. GLOSSARY	8
10. ANNEXES	9

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	4 of 10

1. INTRODUCTION

Corruption and bribery are illegal and unethical practices that negatively affect societies, economies and the proper functioning of markets. These behaviors generate political instability, weaken institutions, erode the rule of law and pose a serious threat to sustainable development and to trust in business environments.

The conduct of our business activities, the promotion of our products and the creation of new opportunities must be carried out under strict standards of integrity, transparency and responsible conduct, in order to protect the organization, strengthen the trust of our stakeholders and contribute to a more ethical business environment.

In this context, the position of Medifarma S.A. (hereinafter, **"humanova"**) is firm and categorical: the organization does not approve or tolerate, under any circumstances, the offering, payment, solicitation or acceptance of bribes, including facilitation payments or any other undue benefit. Consequently, **humanova** declares a zero-tolerance policy toward corruption and any conduct that contravenes the law or the ethical principles that govern its actions, and undertakes to establish, implement, maintain, review and continually improve an Anti-Bribery Management System (hereinafter **"ABMS"**) in accordance with the requirements of the ISO 37001:2025 standard.

The governing body (hereinafter **"The Board of Directors"**) and top management (hereinafter **"General Management"**) lead this commitment by example, by allocating sufficient resources, by actively promoting a culture of integrity and by demanding accountability at all levels of the Organization. The Board of Directors approves this Policy, oversees its implementation and periodically reviews the performance and effectiveness of the ABMS, ensuring that it responds to the risks identified in the internal and external context of the Organization, including those related to sustainability and climate change where applicable to our operations and relationships with business partners.

2. SCOPE

This Policy is mandatory for all employees and directors of all affiliated companies of **humanova**. It also extends to suppliers, contractors, agents and third parties who may represent or act on behalf of **humanova**, as well as third parties in general with whom there may be interaction within the framework of our operations (hereinafter **"business partners"**).

With respect to the business partners with whom **humanova** operates, they are expected to maintain equivalent standards that prevent conduct associated with corruption or bribery. The occurrence of unlawful conduct of this kind by a business partner, where it has not been diligent in its duties of prevention, detection and response to such conduct, may be considered a serious breach of contract.

Where legislation stricter than this Policy exists, **humanova** will adhere to such legislation.

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	5 of 10

3. OBJECTIVES

The objectives of this Anti-Corruption and Anti-Bribery Policy are to:

- Prevent, detect and address the occurrence of acts of corruption, bribery and any improper practice in the conduct of the activities of **humanova**.
- Establish clear guidelines of conduct for employees, executives and third parties, aligned with principles of integrity, transparency and legality.
- Ensure compliance with applicable anti-corruption and anti-bribery legislation in all jurisdictions where **humanova** operates.
- Promote an organizational culture based on ethics, honesty and responsibility in decision-making.
- Encourage the good-faith reporting of possible irregularities, ensuring confidentiality and protection against retaliation.
- Protect the reputation, sustainability and continuity of the business against legal and ethical risks.
- Establish and sustain an anti-bribery culture at all levels of the Organization, continuously assessing the internal and external context, the needs and expectations of interested parties, and emerging risk factors, including those related to sustainability and climate change.
- Comply with the requirements established in the Anti-Bribery Management System (ABMS) and continually improve its effectiveness.

4. CONTENT

4.1. General guidelines

- a) We practice and promote an anti-bribery culture of ethics and corporate compliance at all times, seeking to prevent and detect any type of bribery and corruption in any of its forms. This culture is not limited to the formalization of this Policy, but is expressed in daily decision-making and is actively and visibly promoted by our Board of Directors, General Management and the leaders of our organization.
- b) We drive a preventive culture based on the principle of "ZERO TOLERANCE" toward the commission of crimes and corrupt practices, and on fostering a culture of integrity in all operations in order to prevent, detect, address and prohibit bribery and corruption and any other crime, in accordance with compliance with the laws and legal framework in force and applicable in the country.
- c) We require and promote compliance with the anti-corruption laws applicable to the organization.
- d) We promote this policy as the frame of reference for all employees when making decisions in the course of their activities, in order to prevent their actions from being perceived as, or constituting, unlawful or inappropriate acts or acts linked to the commission of the crime of corruption. Likewise, we require employees to comply with any policy or procedure aimed at regulating their interaction with third parties in order to ensure the transparency of their conduct, thereby reinforcing trust in our

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	6 of 10

organization.

- e) We prohibit the offering, promise, direct or indirect payment, and even any insinuation, hospitality or gift to a public official and/or any third party, for the purpose of obtaining an undue benefit in return; we do not make political contributions, nor do we make facilitation payments.
- f) We encourage the raising of concerns made in good faith, within an environment of trust and guaranteed confidentiality.
- g) We make available to employees and strategic partners a reporting channel called the Ethics Line, through which they may report, anonymously and confidentially, any deviation from compliance with our corporate policies and internal procedures. In addition, we guarantee objective investigation processes, as well as the protection of employees or third parties against any type of retaliation.
- h) We evaluate our employees and strategic partners before and after the start of the business relationship in accordance with our due diligence procedures, and we reserve the right to apply the corresponding sanctions and/or corrective measures if any case of bribery and corruption is identified, without prejudice to any criminal liability that may arise.
- i) We disseminate this policy and train our employees for its full compliance, with the aim of complying with local regulations and international standards
- j) We have an Anti-Bribery Function with the authority and responsibility to oversee the design and implementation of the ABMS, with direct access to the Board of Directors and acting independently from other functions that could create a conflict of interest. We also apply due diligence procedures based on the risk level of our business partners. The Anti-Bribery Function reports on and oversees the implementation and performance of the anti-bribery management system, and provides advice and guidance to personnel and interested parties on the anti-bribery management system and bribery-related matters.
- k) We periodically assess the internal and external context of **humanova**, as well as the needs and expectations of our interested parties, in order to identify emerging bribery risks, including those related to sustainability and climate change where relevant to our operations.
- l) We are committed to complying with the requirements of the anti-bribery management system established in accordance with the ISO 37001:2025 standard and applicable requirements, and to continually improving; this policy provides the framework for establishing and reviewing the organization's anti-bribery objectives
- m) Together we declare integrity to be the most important value of our business culture, being aware of the negative impact and the consequences on the trust of customers, business partners and interested parties of failing to meet the commitments of this Policy, as well as of the associated legal and financial consequences.

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	7 of 10

5. SANCTIONS

Any employee or director of **humanova** who fails to comply with, or has knowledge of actual or potential breaches of, the laws, regulations and/or internal rules of **humanova** (including this Policy) and does not report them and/or obstructs the investigations related to such breaches will be subject to sanctions in accordance with the Internal Work Regulations.

Any employee or director who retaliates or threatens to retaliate against others who report a violation of this Policy will be subject to a disciplinary procedure.

If the business partners of **humanova** breach this Policy, they could face significant consequences, such as the possibility of terminating the business relationship or choosing not to do business with them in the future, including the filing of the corresponding criminal complaint.

6. RESPONSIBILITIES

- 6.1. Board of Directors:** Leads the commitment of **humanova** to act with integrity and responsibility. Approves, oversees and promotes the implementation of this policy, reviews the performance and effectiveness of the ABMS at planned intervals, and ensures the allocation of adequate resources for its operation.
- 6.2. Ethics Committee:** Oversees and promotes the ethical culture at **humanova**. Issues an opinion on and decides on the cases reported through the ethics line. Collaborates in strengthening the culture of integrity and in preventing the commission of crimes.
- 6.3. General Management:** Disseminate and promote this policy among all employees, ensuring that they understand its importance. Provide the resources to establish the controls that make it possible to ensure compliance with the policy.
- 6.4. Compliance Officer:** In charge of the Anti-Bribery Function, with authority and responsibility to oversee the design and implementation of the ABMS and direct access to the governing body. Oversees compliance with this policy, acting independently from other functions that could create a conflict of interest. Provides guidance to personnel on anti-bribery matters. Reports to the governing body on the performance and compliance of this policy
- 6.5. Employees/Workers:** Know and apply this policy.

7. REFERENCES

- Document 1: Compliance Program Manual for the Prevention of Crimes
- Document 2: Donations Policy
- Document 3: Gifts and Hospitality Policy
- Document 4: Conflict of Interest Policy
- Document 5: Policy on Engagement with Public Officials
- Document 7: Due Diligence Procedure

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	8 of 10

8. REVISION HISTORY

Revision No.	Description of Change
02	This policy is updated to align the ABMS of humanova with the requirements of the ISO 37001:2025 standard, incorporating the role of the governing body, the anti-bribery culture, the independent Anti-Bribery Function and the ongoing assessment of the context and interested parties.

9. GLOSSARY

- **Anti-bribery culture:** set of values, ethics, beliefs and behaviors that exist in an organization (3.2) and that interact with the organization's structures and control systems to produce behavioral norms that lead to the anti-bribery policy (3.10) and anti-bribery management system (3.5). (Definition 3.30 ISO37001:2025)
- **Anti-bribery function:** Persons with responsibility and authority for the operation of the anti-bribery management system.
- **Bribery:** Offering, promising, giving, accepting or soliciting an undue advantage of any value (which may be financial or non-financial), directly or indirectly, and irrespective of location, in violation of applicable law, as an inducement or reward for a person to act or refrain from acting in relation to the performance of that person's duties.
- **Conflict of interest:** A situation in which an interested party has a personal or organizational interest, directly or indirectly, that may compromise or interfere with the ability to act impartially in the performance of their duties in the best interest of humanova.
- **Corruption:** The abuse of authority or public power for personal gain, or the abuse of power in private business activities outside the scope of government.
- **Due Diligence (DD):** Process to assess in greater detail the nature and extent of bribery risk and to help organizations make decisions in relation to specific transactions, projects, activities, business partners and personnel.
- **Facilitation payments:** Small improper payments made to a public official (or, in some cases, to another person) to expedite or secure the performance of a routine or necessary action to which the payer is already entitled. These payments constitute a specific type of bribery.
- **Governing body:** Person or group of people who have ultimate accountability for the whole organization.
- **Interested party:** Person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity related to the ABMS of **humanova**, such as employees, shareholders, business partners, regulators and society at large.
- **Public Official:** Any person who holds a legislative, administrative or judicial office, by appointment, election or succession, or any person who exercises a public function, including for a public body or a public enterprise, or any official or agent of a local or international public organization, or any candidate for public office.

DEPARTMENT: COMPLIANCE

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY				POLICY N° POL-CNO-012-00
ISSUE DATE	REPLACES	EFFECTIVE DATE	VALID UNTIL	PAGE N°
2026-09-01	PC-001-v1	2026-09-02	2029-09-01	9 of 10

10. ANNEXES

Not applicable

