



ANTI-BRIBERY POLICY

The management of **PROGNOSIS BIOTECH SA** recognizes the risks of bribery and corruption (hereinafter collectively referred to as "bribery") and allocates all necessary resources for the development and implementation of a comprehensive Anti-Bribery Management System (ABMS) in accordance with the requirements of the international standard **ISO 37001:2016**.

Within this framework, procedures are documented and implemented to meet the requirements of the Standard, ensuring effective combating of bribery across all areas and activities of the Company.

A. Applicable Principles / Commitments

The Company's Management, throughout its operations:

- Prohibits all forms of bribery or its acceptance.
- Requires all employees to comply with national and European Union laws related to bribery, which apply to the Company.
- Encourages all employees to contribute to the identification and suspicion of any potential bribery and prohibits the punishment or negative treatment of such employees who, in good faith, report or disclose the above.
- Commits to implementing measures and providing the necessary resources to combat bribery.
- Raises awareness and properly trains its personnel through continuous briefings and training sessions on anti-bribery measures.

- Has established structures for combating bribery, in accordance with the Anti-Bribery Management System (ABMS), which are: (a) the System Management Officer (SMO) (b) the Anti-Bribery Committee (ABC).
- Commits to the continuous improvement of the ABMS that it implements.

B. Definition / Responsibilities

B.1. The **SMO** is appointed by the Board of Directors and has the following duties:

- Coordinates the Company's relevant issues and advises the Board of Directors on the Anti-Bribery Policy and any amendments or adaptations.
- Ensures the implementation of the Company's Policy and applicable legislation.
- Promotes interest in anti-bribery issues among employees and provides advice and guidance to Management and employees regarding the ABMS and issues related to bribery.
- Conducts inspections on the above matters and prepares reports on the ABMS's performance.
- Receives any reports or complaints regarding violations of this Policy or, if they personally become aware of such violations, drafts a report and forwards it to the ABC.

Additionally, the SMO ensures that the ABMS is continuously installed, implemented, and maintained, presents inspection reports on the ABMS performance to the Company's Management for review, and that these reports are used as the basis for its continuous improvement.

B.2. The **ABC**, in terms of its staffing, is identical to that defined in the Company's whistleblowing policy concerning breaches of Union Law, which the Company has approved and adopted. It has the duty and authority to investigate any possible bribery cases brought to its attention. In cases of

bribery or non-compliance with the requirements of the ABMS and this Policy, it recommends to the Board of Directors the imposition of disciplinary actions, as outlined in the Company's Internal Regulations, or even reports to the relevant Authorities if a violation of the law is identified.

C. Employee Obligations

Specifically, with regard to employees:

- Employees are prohibited from engaging in any form of bribery or actions that could potentially be interpreted as bribery of third parties. Employees are not allowed to offer, promise, or provide illegal benefits or rewards, of any kind, to decision-makers in the public or private sector to secure preferential treatment for the Company or influence a decision in its favor. If a public official or private individual encourages or asks an employee to violate this prohibition, the employee must immediately inform their supervisor.
- It is prohibited for employees to offer or promise any rewards or other advantages from suppliers or other partners of the Company to influence the employee and have business decisions made in their favor. Likewise, employees are prohibited from demanding any form of rewards or advantages from suppliers or other partners of the Company. In this context, each employee must avoid even the appearance of impropriety that similar offers could influence the Company's business decisions. In case of an offer, promise, or granting of any reward, advantage, or benefit from third parties, the employee must immediately inform their supervisor.

D. Scope of Application / General Provisions

Compliance with this Policy is mandatory and binding for all personnel and associates of the Company. The Policy and any amendments to it are approved by the Board of Directors. It is communicated to all personnel by the SMO and is available to the Company's customers, partners, suppliers, and any Public or Municipal Authority through the Company's website, where the SMO and their contact details are listed. For any concerns or possible reports related to this Policy, you can contact the Company's SMO.

Edition	Date	Description	Approval
1 ⁿ	15.12.2023	Anti-bribery policy	12.1.2024 Board Meeting