

## ANTI-CORRUPTION POLICY HOSPIMED, spol. s r.o.

### PREAMBLE

HOSPIMED, spol. s r.o. (hereinafter referred to as "HOSPIMED" or "the Organization") is a commercial and service organization whose services and supplies are mainly directed to public contracting authorities. The objective of the sustainable development of the Organization is the permanent compliance of all activities of the Organization with generally binding legal regulations and internal regulations, which the Organization has adopted voluntarily and by which it defines its principles and values.

The implementation of ISO 37001 *Anti-Corruption Management Systems* into the Integrated Management System of the Organization is another step on our way to transparent compliance with the legal regulations, ethical rules and continuous improvement of the *compliance system* in practice.

### THE PURPOSE OF ANTI-CORRUPTION POLICY

The purpose of the anti-corruption policy is to establish supporting rules to strengthen the corporate culture in the fight against corruption and to avoid or mitigate the risks arising from participation in corruption. The anti-corruption policy is intended to minimize the motivation of all employees, executives as well as senior management to engage in corrupt and other illegal conduct and to increase their awareness that if they resort to corruption or participate in creating a corrupt environment, they will be detected and punished. The purpose is also to influence business partners to adopt a zero-tolerance philosophy towards corruption and other forms of malpractice aimed, inter alia, at distorting competition.

### THE COMMITMENT OF THE ORGANISATION

HOSPIMED has a **zero tolerance** policy towards corrupt behaviour and crime in general in any form. The organisation takes all steps to implement and maintain an effective Anti-Corruption Management System in accordance with the international standard ISO 37001, which it **IS COMMITTED TO** uphold.

The Organisation's Anti-Corruption Policy forms part of the Anti-Corruption Management System, which the Organisation has implemented with regard to its size and the areas in which it operates (the context of the Organisation). The Organization's Code of Ethics and other regulations are an integral part of the Anti-Corruption Policy. Like the list of rules contained in the Code of Ethics, the Organization's Anti-Corruption Policy cannot be exhaustive. Therefore,

the Organization and its employees or senior management are obliged to act in accordance with its basic principles, tenets and objectives, as well as in accordance with the Organization's Anti-Corruption Management System as a whole, even in situations not covered by the Anti-Corruption Policy.

## BASIC PRINCIPLES OF HOSPIMED'S ANTI-CORRUPTION POLICY

### COMMUNICATIONS

Active communication in the area of anti-corruption policy The organisation is managed by senior management. Senior management has appointed a Compliance Manager to oversee compliance with anti-corruption regulations and policies. The Organization's Anti-Corruption Policy is permanently accessible to all employees and externally to all business partners on the Organization's website.

### PROHIBITION OF CORRUPTION AND COMPLIANCE WITH REGULATIONS

The organization acts at all times and in all circumstances in accordance with the law and does not tolerate any corrupt behaviour or other criminal activity. Corrupt conduct includes, in particular, the acceptance of a bribe, bribery or indirect bribery. A bribe is defined as an undue advantage consisting of a direct pecuniary enrichment or other advantage given or intended to be given to the person bribed or, with his/her consent, to another person, to which he/she is not entitled.

The Organization **prohibits** all employees, and others acting on behalf of or for the benefit of the Organization, from **any corruption** or conduct that could be construed as a means of "facilitation" in relation to competent authorities or competent persons in the state or municipal sphere in connection with their decision-making processes, which in any way relate to or may relate to the activities of the Organization, as well as prohibits any corrupt conduct towards any third parties in connection with their decision-making processes which in any way relate to or may relate to the activities of the Organization.

### GOAL SETTING, OPENNESS AND CONTINUOUS IMPROVEMENT

The anti-corruption management system is ensured by the top management of the Organization, with the help of the Compliance Manager, actively enforces the Anti-Corruption Policy towards all employees and third parties, sets anti-corruption objectives, supervises and regularly reviews the correct setting and functioning of the system, and takes corrective measures.

By actively managing corruption risks, the organisation seeks to continuously improve the entire system in order to prevent the emergence of a potentially corrupt environment. To do this, it uses the system's control mechanisms and regular corruption risk assessments. An independent Compliance Manager oversees the system and its compliance with the requirements of the standard, actively communicates, receives notifications, provides advice within the Organization and takes other actions within the scope of assigned responsibility and authority.

The organization provides its employees and senior management with regular training in anti-corruption management and the fight against corruption. Every employee of the Organization can comment on this Anti-Corruption Policy and the whole system, its effectiveness, adequacy and functionality and suggest ways to improve it.

### **ETHICS LINE AND WHISTLEBLOWER PROTECTION**

All employees, managers, third parties may report in good faith or on the basis of a reasonable belief an attempt or any violation or weakness in the Organization's Anti-Corruption Management System, even anonymously. The submission can be made through the ethics hotline: [compliance@hospimed.cz](mailto:compliance@hospimed.cz), which is used to submit complaints in relation to the functioning of the Organisation's anti-corruption management system. This e-mail address is managed by the Compliance Manager. In the case of paper submissions: HOSPIMED, spol. s r.o., exclusively to the Compliance Manager, Malešická 2251/51, 130 00 Prague 3.

Except to the extent necessary for the conduct of the investigation, the Organization shall maintain confidentiality, both as to the identity of the whistleblower and other persons concerned, as appropriate, and as to any information contained in the notification.

The organisation will not take any retaliatory action against the whistleblower and other natural or legal persons (e.g. colleagues, assistants of the whistleblower, persons close to the whistleblower, legal persons of which the whistleblower is a partner, etc.). Retaliation is defined as any direct or indirect act or omission occurring in the work context that is triggered by an internal or external communication and that causes or is likely to cause unjustified harm to the whistleblower.

### **CONSEQUENCES OF NON-COMPLIANCE**

If any employee, manager or member of the senior management is found to have violated the rules of the Anti-Corruption Management System (especially in relation to possible corruption), the Organization will be subject to the employment consequences arising from the relevant legislation (especially the Labour Code).

The Organization reserves the right to bind business partners to comply with the Anti-Corruption Policy and to terminate contractual relations with those who do not comply with their commitment.

This is without prejudice to the obligation of the Organization to refer the matter to the law enforcement authorities for investigation, if so provided by law.

*This Anti-Corruption Policy was adopted by the senior management of the Organization on 17.10.2022*