
ANTI-BRIBERY POLICY

MEDITRUST GROUP AE is committed to implementing, developing, and continuously improving the effectiveness of an Anti-Bribery Management System in accordance with ISO 37001:2016.

The company applies a zero-tolerance policy against bribery, corruption, or any other unlawful act and follows legally prescribed procedures to prevent the occurrence of such incidents by its personnel and business partners. It also ensures the imposition of sanctions in the event of violations of this Policy and, where relevant legal requirements are breached, reports are made to the competent authorities.

To achieve the above, the company:

- Has established a **CODE OF PROFESSIONAL ETHICS** and a **SUPPLIER / PARTNER CODE**
- Raises awareness and properly trains its personnel through continuous briefings and training on understanding bribery-related issues
- Encourages personnel to report bribery incidents without fear of retaliation
- Conducts due diligence checks on personnel and business partners
- Commits to implementing measures and providing the necessary resources for their execution within the framework of implementing and improving the effectiveness of the Anti-Bribery Management System

The company does not engage with organizations involved in bribery practices and will terminate any relationship if such conduct is identified. It does not knowingly participate in any transaction that could be interpreted as bribery and requires the same commitment from its personnel and partners.

All benefits, gifts, hospitality or entertainment expenses, organization or funding of conferences or seminars, or sponsorships for events organized by scientific bodies are subject to evaluation and assessment to ensure compliance with this Policy and applicable legislation.

The Company continuously evaluates bribery-related risks arising from its activities and prioritizes risks and opportunities through systematic assessment

Management has authorized the Anti-Bribery Compliance Officer, in cooperation with the Reporting Intake Officer, to independently investigate suspected bribery cases, assess related risks, and implement appropriate mitigation measures.

The Company ensures that this Anti-Bribery Policy is communicated, understood, and applied by all employees, business partners, and relevant interested parties

This Anti-Bribery Policy has been approved by Management.