

# **ANTI-CORRUPTION AND FRAUD POLICY**

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## **1. Introduction**

The Board of Directors of Clínica Baviera is responsible for approving and updating the corporate policies, which contain the guidelines that govern the actions of the Company and the companies within the Group (hereinafter referred to as the GROUP).

Corruption and fraud slow down economic development, weaken democracy and are detrimental to social justice and the rule of law, causing serious damage to the economy and society, and in many cases facilitating the operations of organised crime.

The Society, established as a benchmark for its firm commitment to ethical principles, assumes the responsibility to actively participate in the challenge of fighting corruption and fraud in all its areas of activity.

In assumption of these commitments and in the exercise of the aforementioned responsibilities, the Board of Directors of the Company approves this Policy against corruption and fraud within the framework of the law and the Bylaws and the Code of Ethics in which the Purpose and Values of Clínica Baviera are set out.

## **2. Scope of application**

This policy applies to the entire GROUP, understood as the group of companies headed by Clínica Baviera S.A., including not only those in which Clínica Baviera S.A. has a majority shareholding, but also those in which it is responsible for their effective management.

Likewise, this policy applies to all the activities of the GROUP and to all employees, directors and members of the Administrative Body. Furthermore, all third parties acting on behalf of the GROUP or otherwise providing a service on behalf of the GROUP and/or in any other capacity in connection with the GROUP shall be made aware of this Policy in accordance with the principle of proportionality.

## **3. Purpose**

The purpose of this Policy is to project to all members of the management team and professionals of the companies belonging to the GROUP, as well as to third parties related to them, a resounding message of opposition to corruption and fraud in all its manifestations, and the GROUP's will to combat it in all its activities.

The Compliance Policy, together with this Policy, accredits GROUP's commitment to the permanent vigilance and punishment of fraudulent acts and conduct or conduct that encourages corruption in any of its manifestations, the maintenance of effective communication and conscience raising mechanisms for all professionals and the development of an ethical and honest corporate culture .

## **4. Basic principles of action**

The principles governing this policy are as follows:

- The GROUP does not tolerate, permit or engage in any form of corruption, including extortion and bribery, in the conduct of its business, whether in the public or private sector.
- The GROUP promotes a preventive culture based on the principle of "zero tolerance" towards corruption in business, in all its forms, as well as towards the commission of other illegal acts and situations of fraud and promotes the application of the principles of ethics and responsible behaviour of all GROUP professionals, regardless of their hierarchical level and the country in which they work. This principle of "zero tolerance" towards corruption in business is absolute and takes precedence over the obtaining of any type of financial or other benefit for the GROUP or its professionals, when this is based on a business or transaction that is illicit or contrary to the ethical principles contained in the Code of Ethics.
- Relations between the GROUP 's professionals and any public administration, authorities, civil servants and other persons involved in the exercise of public duties, as well as political parties and similar entities shall be governed, in all cases, by the principles of cooperation, transparency and honesty.
- The GROUP promotes an environment of transparency, maintaining an appropriate whistle-blowing channel to encourage the reporting of possible irregularities. The GROUP undertakes not to take any form of retaliation, directly or indirectly, against persons who have reported, through the whistle-blowing channel, any irregular conduct or any act contrary to the law, including the rules of conduct of the Code of Ethics, unless they have acted in bad faith.
- The risks associated with fraud and corruption are duly identified, evaluated and mitigated in all GROUP activities with appropriate controls and procedures, and in particular in all transactions involving relationships with third parties.
- The GROUP 's relationship with its suppliers is based on legality, business ethics, efficiency, transparency and honesty. To this end, the GROUP adapts its supplier selection processes to criteria of objectivity and impartiality and avoids any conflict of interest or favouritism in their selection.

## **5. Supervision and review**

The Audit Committee is responsible for supervising compliance with the provisions of this policy and, if necessary, making proposals for amendments for subsequent approval by the Board of Directors.

Likewise, this Policy shall be subject to continuous review and improvement, especially when regulatory, social, business or any other circumstances so require. In any event, it shall be subject to annual review.

## **6. Approval**

This Policy shall be approved by the Board of Directors.



## **7. Entry into force**

This policy shall enter into force on 29 March 2022.

Madrid, 28 March 2022.

The Secretary of the Board of Directors