

ANTI-BRIBERY POLICY

REFORMER, recognizing the importance of business integrity, transparency, and responsible corporate governance, commits to conducting all its business activities with professionalism, ethical principles, honesty, and full compliance with applicable legislation and regulatory requirements.

For this reason, the Management of REFORMER has established and implements an Anti-Bribery Management System in accordance with the principles of the ISO 37001 standard – Anti-Bribery Management System, aimed at preventing, detecting, and addressing incidents of bribery and corruption.

This Policy applies to all levels of REFORMER's organizational structure and concerns:

- members of Management,
- executive officers,
- all employees regardless of position or employment relationship,
- external associates,
- consultants,
- suppliers,
- subcontractors,
- representatives and any third party acting on behalf of the Company.

REFORMER applies a zero-tolerance policy against any form of bribery and corruption and does not permit, directly or indirectly, any act aimed at unfairly influencing business decisions or obtaining an undue advantage.

In this context, REFORMER is committed to:

- Compliance with all applicable legislative, regulatory, and contractual requirements related to combating bribery and corruption.
- The prohibition of offering, promising, providing, or accepting any improper financial or other advantage, directly or through third parties, aimed at influencing a business decision.
- The prohibition of facilitation payments or any other practice violating the Company's principles of ethics and integrity.
- Managing conflicts of interest through the identification, evaluation, and handling of situations that may affect the objectivity and independence of business decisions.
- The implementation of bribery and corruption risk assessment procedures, with particular emphasis on activities such as:
 - collaborations with healthcare entities,
 - public and private organizations,
 - procurement,
 - selection of partners and representatives,
 - commercial agreements.
- The implementation of appropriate controls on third parties, ensuring that partners, suppliers, and representatives operate in accordance with REFORMER's principles of integrity.
- The provision of appropriate briefing and training to personnel, ensuring all employees understand their obligations and the risks associated with bribery and corruption.

- The provision of secure reporting channels for incidents or suspicions of violations, through which employees and third parties can express concerns without fear of retaliation or adverse treatment.
- The protection of persons who report incidents or suspicions of violations in good faith, in accordance with applicable whistleblowing protection legislation.

Non-compliance with this Policy may lead to the adoption of corrective and/or disciplinary measures, including termination of collaboration, as well as further legal action where required.

The Policy is communicated to all employees and is available to the interested parties of REFORMER.

For the Management
Antonis Billiris
Chief Executive Officer