

Anti-Corruption and Anti-Bribery Policy

Cayman Pharma, Czech Republic

Cayman Pharma, s.r.o. is committed to conducting business in an ethical and honest manner and to implementing and enforcing systems that ensure corruption and bribery is prevented. Cayman Pharma s.r.o. has a zero-tolerance policy toward corruption and bribery. We are committed to act professionally, fairly, and with integrity in all business relationships, regardless of the country in which we operate.

Definition of Corruption: Abuse of entrusted power, position, or authority for personal or private gain. It includes both direct and indirect actions aimed at obtaining an improper advantage. Corruption typically involves unethical or unlawful conduct such as offering, giving, receiving, or soliciting benefits that influence decision-making processes in a manner that compromises integrity, transparency, and fairness.

Definition of Bribery: Bribery is specific form of corruption including both an active and passive act involving the offering, giving, promising, soliciting, consenting to, accepting, or demanding of anything of value or benefit, with the intent to induce or influence an action or decision. Bribes refer to any inducement, reward, or item of value offered to another individual for the purpose of obtaining business, contractual, regulatory, or personal advantages. Bribery is not limited to the act of offering a bribe.

General principles of this policy cover 4 areas:

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

Cayman Pharma s.r.o. accepts customary and reasonable gestures of hospitality and goodwill (whether given or received from third parties), provided that the giving or receiving of gifts meets the following requirements:

- a. It is not given with the intent to influence the recipient, to obtain or reward business conduct or commercial advantages, or as an explicit or implicit exchange for a benefit or favor.
- b. It is not provided in expectation of reciprocity
- c. It complies with local laws.
- d. It is given on behalf of the company, not on behalf of an individual.
- e. It does not involve cash or cash equivalents (e.g., a voucher or gift certificate).
- f. It is appropriate for the circumstances (for example, giving small gifts around Christmas or as a small token of appreciation to a company for helping with a major project upon its completion).
- g. It is of an appropriate type and value and is given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly. It is not selectively given to key, influential individuals with the clear intent to directly influence them.

Cayman Pharma s.r.o. does not accept and will not make any form of facilitation payments of any nature.

Cayman Pharma s.r.o. will not make gifts, whether in cash or otherwise, to support any political parties or candidates.

Cayman Pharma s.r.o. accepts (and actively supports) charitable giving — whether through services, expertise, time, or direct financial contributions (in cash or otherwise) — and agrees to disclose all charitable contributions it makes.

As an employee of Cayman Pharma s.r.o., you must read, understand, and comply with the information contained in this policy and in any training or other information regarding anti-corruption conduct that has been provided to you.

If you suspect that a case of corruption or corrupt conduct exists in relation to Cayman Pharma s.r.o., you are encouraged to raise your concerns as soon as possible. If you are unsure whether a particular action or behaviour could be considered bribery or corruption, you should speak with your manager or a company director.

You must inform your managers as soon as possible if someone offers you a bribe, if you are asked to give or accept one, if you suspect that you may be bribed or asked for a bribe in the near future, or if you have reason to believe that you are a victim of other corrupt activities.

If you refuse to accept or offer a bribe or report concerns regarding potential acts of bribery or corruption, Cayman Pharma s.r.o. understands that you may be concerned about possible

consequences. Cayman Pharma s.r.o. will support anyone who, in good faith, suggests an investigation under this policy, even if the investigation finds that they were mistaken.

Cayman Pharma s.r.o. will ensure that no one is harmed as a result of refusing to accept or offer a bribe or engage in other corrupt activities, or because they reported concerns regarding a possible act of bribery or corruption.

Bribery is illegal. Employees must not engage in any form of bribery, whether directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes of any kind, and if they are unsure whether something constitutes a bribe or a gift or hospitality, they must seek further guidance from company management.

Company targets:

- Prevention of bribery and corrupt practices
 - Corruption risk assessment concluded for the whole company
 - Follow-up specific training for positions which are most likely to be exposed to bribery and/or corrupt practices (in addition to basic training)
 - Annual reporting of incidents