APPENDIX I: The Affiliate's ANTI-BRIBERY POLICY

At Siemens Healthineers Hellas S.A., we are committed to conducting our business with integrity, transparency and in compliance with applicable anti-bribery laws and regulations, relevant Siemens Healthineers requirements and the requirements of our Anti-Bribery Management System (ABMS), established in accordance with ISO 37001:2025.

We recognize that bribery can cause significant harm to our organization, our interested parties and society. This Policy is therefore appropriate to the purpose and context of the Affiliate and supports our commitment to preventing, detecting and responding to bribery.

The Policy applies to all personnel and, as appropriate and proportionate to bribery risk, to relevant contractors, consultants, agents and business associates.

Our Commitments

Siemens Healthineers Hellas S.A.:

- prohibits bribery in all its forms and maintains zero tolerance towards bribery and corrupt conduct;
- complies with applicable anti-bribery laws, regulations, ABMS requirements and relevant Parent Company requirements;
- conducts its activities with honesty, integrity, fairness and transparency;
- maintains appropriate and accurate records of transactions and business activities;
- establishes and reviews anti-bribery objectives at relevant functions and levels, providing a framework for achieving and evaluating those objectives;
- encourages concerns to be raised in good faith or on the basis of a reasonable belief, confidentially and without fear of retaliation;
- prohibits retaliation, discrimination or other adverse treatment against persons who raise concerns in good faith or on reasonable belief;
- applies appropriate disciplinary, contractual or other measures where this Policy or ABMS requirements are violated; and
- is committed to the continual improvement of the suitability, adequacy and effectiveness of the ABMS.

Leadership, Responsibilities and Anti-Bribery Function

The Governing Body and Top Management demonstrate leadership and commitment to the ABMS and promote a culture in which bribery is not acceptable.

Top Management is responsible for ensuring that anti-bribery requirements are integrated into the Affiliate's business processes, that appropriate resources are made available and that the ABMS achieves its intended results.

The Affiliate has designated an anti-bribery function responsible for overseeing the design and implementation of the ABMS, providing advice and guidance to personnel and relevant interested parties, monitoring conformity with applicable requirements and reporting on ABMS performance to Top Management and the Governing Body.

The anti-bribery function is provided with appropriate authority, independence, competence, status and resources and has direct and prompt access to Top Management and the Governing Body where necessary.

All personnel are responsible for complying with this Policy and the ABMS requirements applicable to their activities and for raising concerns where appropriate.

Bribery Risk Management and Business Associates

The Affiliate identifies, assesses and reviews bribery risks at planned intervals and when significant changes or new information arise. The results of these assessments are used to establish and continually improve reasonable and proportionate controls. Relevant business associates are subject to risk-based due diligence, contractual requirements and other controls, as appropriate. Business associates posing a more than low bribery risk are required, where practicable, to comply with appropriate anti-bribery requirements and commitments communicated by the Affiliate.

Awareness and Training

The Affiliate provides appropriate anti-bribery awareness and training to personnel from the commencement of employment and thereafter at planned intervals, taking into account their responsibilities, bribery-risk exposure and changing circumstances. Where appropriate, relevant business associates acting on behalf of or for the benefit of the Affiliate are also provided with or required to receive suitable anti-bribery awareness or training.

Raising Concerns and Investigations

Siemens Healthineers Hellas S.A. encourages personnel, business associates and other relevant interested parties to raise concerns in good faith or on the basis of a reasonable belief regarding attempted, suspected or actual bribery, or any violation of or weakness in this Policy or the ABMS.

Concerns may be raised through the available reporting channels, including the corporate “Let Us Know” platform; the independent Ombudswoman at shs-ombudsfrau@hvc-strafrecht.de; the local Y.P.P.A. (**Υπεύθυνος Παραλαβής και Παρακολούθησης Αναφορών** – Responsible Person for Receipt and Monitoring of Reports) through the designated local reporting channel established in accordance with Greek Law 4990/2022; the Compliance Officer / anti-bribery function; an employee's manager or other appropriate management channel; or other reporting channels made available by Siemens Healthineers.

The Affiliate maintains and communicates current contact details and instructions for these channels through appropriate internal and external communication means. This allows reporting arrangements to remain current without requiring amendment of this Policy whenever a responsible person or contact detail changes.

Reports are handled confidentially, and anonymous reporting is available through applicable channels where permitted by law. The identity of reporting persons and other persons referred to in a report is protected in accordance with applicable legal requirements.

Retaliation, discrimination, dismissal, demotion, harassment, intimidation or other adverse treatment against a person who raises a concern in good faith or on reasonable belief is prohibited.

Reports are appropriately assessed and, where warranted, investigated in accordance with the Affiliate's investigation procedures. Appropriate corrective, disciplinary, contractual, legal or other actions are taken based on the findings and applicable requirements.

Monitoring, Review and Continual Improvement

The Affiliate monitors and evaluates its anti-bribery performance and the effectiveness of the ABMS through monitoring and measurement, internal audits, Management Reviews and reviews by the anti-bribery function. Top Management reviews the ABMS at planned intervals to ensure its continuing suitability, adequacy and effectiveness. The Governing Body exercises oversight and reviews Top Management's implementation of the ABMS at planned intervals.

The results of monitoring, audits, reviews, investigations, risk assessments and other relevant activities are used to support the continual improvement of the ABMS.

Communication and Availability

This Anti-Bribery Policy is maintained as **documented information**, communicated within Siemens Healthineers Hellas S.A. and made available to relevant **interested parties, as appropriate**.

The Policy is communicated directly to personnel and to **business associates posing more than a low bribery risk**, in accordance with the Affiliate's bribery risk assessment, due diligence and communication arrangements.

Failure to comply with this Policy may result in disciplinary, contractual or other appropriate action in accordance with applicable law and Siemens Healthineers requirements.