

## ANTI-BRIBERY POLICY

At Siemens Healthineers Hellas S.A., we are dedicated to conducting our business with integrity, transparency, and in full compliance with all applicable anti-bribery laws and regulations, as well as the requirements of our Parent Company and the ISO 37001:2016 International Standard. We acknowledge that bribery and corruption present significant risks to our business, stakeholders, and society. Therefore, we have developed and implemented this Anti-Bribery Policy to ensure we uphold the highest standards of ethical conduct and prevent bribery in all its forms. This Policy applies to all employees, officers, directors, contractors, consultants, agents, and business partners, regardless of their position or role within the Affiliate.

Our Anti-Bribery Policy is defined and strongly driven by the following commitments and principles:

**Zero Tolerance:** We maintain a zero-tolerance stance towards bribery and corruption in all its forms: All forms of bribery are prohibited. We will not engage in, condone, or tolerate any bribery or corrupt behavior. We are commitment to satisfy all Anti-Bribery Management System requirements.

**Compliance with Laws and ISO 37001:2016:** We are committed to complying with all applicable anti-bribery laws and regulations in every jurisdiction where we operate, as well as adhering to the requirements of the ISO 37001:2016 International Standard.

**Ethical Conduct:** We conduct all business activities with honesty, integrity, and fairness, avoiding any actions that could compromise our ethical standards or reputation.

**Transparency:** We maintain accurate and transparent records of all transactions and interactions, ensuring that our business practices are open to scrutiny.

**Accountability:** We hold individuals and entities accountable for any acts of bribery or corruption committed on behalf of Siemens Healthineers Hellas S.A., imposing disciplinary actions in accordance with Directive 1\_D\_6 (*Global Compliance*).

**Anti-bribery objectives:** We have establishing and continually review measurable anti-bribery objectives through the Management Review process, which support our strategic direction and commitment to this Policy.

**Continuous Improvement:** We are dedicated to continuously reviewing and enhancing our Anti-Bribery Management System, to adapt to changing legal requirements and emerging risks.

Towards these ends, the Affiliate has designated an Anti-Bribery Compliance Function who is responsible for overseeing the implementation and enforcement of the Anti-Bribery Management System, conducting risk assessments, providing anti-bribery training and guidance to employees, investigating reported incidents, and monitoring compliance with anti-bribery laws and regulations.

The Affiliate conducts regular risk assessments to identify and evaluate potential bribery and corruption risks associated with our business activities, including interactions with third parties, government officials, and high-risk jurisdictions. The findings of these risk assessments will inform the development of risk-based controls and mitigation measures.

Further, all senior management is responsible for establishing and promoting a culture of integrity, ethics, and compliance throughout the Affiliate. They are accountable for the effectiveness of the Anti-Bribery Management System and must provide the necessary resources and support to ensure its success. All employees are responsible for familiarizing themselves with this Anti-Bribery Policy and complying with its provisions in their day-to-day activities. They must report any suspected or actual instances of bribery or corruption to the Anti-Bribery Compliance Function. Business partners are expected to adhere to the same standards of integrity and ethics as Siemens Healthineers Hellas S.A. and comply with all applicable anti-bribery laws and regulations. We will only engage with business partners who share our commitment to preventing bribery and corruption.

We will provide regular training and awareness programs to educate employees and relevant stakeholders about the risks of bribery and corruption, the requirements of this Policy, and their responsibilities in preventing and reporting incidents of bribery. Training will be tailored to the specific roles and responsibilities of different personnel and will be conducted periodically to reinforce understanding and compliance.

Siemens Healthineers Hellas S.A. encourages open communication and transparency regarding concerns or suspicions of bribery or corruption. Employees, contractors, and other stakeholders are encouraged to report any suspected or actual incidents of bribery or corruption without fear of reprisal to the "Let Us Know" platform, or the independent legal representative (*Ombudswoman*, e-mail: [shs-ombudsfrau@hvc-strafrecht.de](mailto:shs-ombudsfrau@hvc-strafrecht.de)). All reports will be promptly, and thoroughly investigated, and appropriate corrective actions will be taken based on the findings of the investigation.

We will monitor compliance with this Policy through regular audits, reviews, and assessments of our Anti-Bribery Management System. Senior management will review the effectiveness of the Policy and its implementation, on a minimum, on an annual basis.