

## OPERATING PROCEDURE

### MS-A-0004- COMBATING BRIBERY AND CORRUPTION

#### 1. SCOPE

The scope of this policy is to ensure that neither DEMO staff nor any third party acting on DEMO' s behalf gives, offers or promises payments, gifts or anything of value directly or indirectly to any natural person so as to influence that natural person to conduct or maintain business with DEMO or gain an improper business advantage for DEMO.

Creating a strong anti-corruption and anti-bribery culture of compliance is a core value of the Company, adding value to the relationships with the customers and the partners, as well as with the public authorities.

#### 2. IMPLEMENTATION

This policy concerns all DEMO staff.

#### 3. DEFINITIONS/ ABBREVIATIONS

- **Bribery:** Giving or receiving a bribe, directly or indirectly, with the intention of influencing the recipient to serve a purpose favorable to the person providing the bribe. The exercise of influence may manifest, among other ways, through the involvement of an individual in committees on compensation, pricing, or drug approval, or simply through the directed prescribing of products of DEMO.

- "**Improper**" **payment:** Anything of value that can influence a government/public official or any other powerful person to secure an advantage to DEMO's business in exchange for payment.

- **Corruption:** Corruption is the abuse of the power entrusted to a person for his own benefit.

- **Government or Public Official:** Natural Person who either receives part of his salary from the state or fulfills a state function with or without remuneration.

- **Compliance Unit:** the Company's department responsible for ensuring that the Company complies with laws, regulations, internal policies, and standards governing its activities.

- **Anti-Bribery Management System:** the structured framework of policies, procedures, and controls implemented by the Company to prevent, detect, and address bribery and corruption in all its activities, which includes the K009/22.07.2024 Continuous Improvement Procedures and the K010\_v2/ 22.01.2025 Anti-Bribery Procedures.

#### 4. GENERAL

1. All forms of corruption and bribery are explicitly prohibited not only within the Company, but also in the interactions with customers, suppliers, partners, subcontractors and public authorities. No employee of the Company is allowed to give, promise or receive from any natural person any improper payment, gift or any other item of value.
2. It is prohibited to pay, promise to pay or offer any item of value or any other type of benefit to any government or public official.

3. Natural Persons or Organizations acting on behalf of the Company must follow the same strict rules. Commission, consulting fee or any other payment to any third party must not be used as a means of bribery or other improper payments.
4. **All reports of the Company's financial data** should be accurate, appropriate and reflect the actual data.
5. There must not be, for any reason whatsoever, any false, artificial or misleading entry in the Company's books or records. Any transaction other than that described in the relevant documents proving its validity and conformity is prohibited.
6. It is prohibited **not to register any funds or assets** in the relevant books and records of the Company.
7. No employee has the right to sign, submit or permit others to sign or submit on behalf of the Company any document or statement which the employee himself knows or has reason to suspect is **false or misleading**.
8. Any employee or business partner can report such issues without fear of dismissal, adverse changes, or any kind of retaliation. Furthermore, the Company commits that staff will not suffer from retaliation, discrimination, or disciplinary action (such as threats, isolation, downgrading, block of promotion, transfer, dismissal, intimidation, victimization, or other forms of harassment) when the employee:
  - a) refuses to participate or rejects an activity where they have reasonably determined that the risk of bribery is more than low, and the Company has not taken the required mitigating measures, and
  - b) expresses concerns or makes a report in good faith, or based on reasonable suspicion, regarding attempted, actual or suspected bribery or violation of this Policy or the Anti-Bribery and Anti-Corruption Management System.
9. Non-compliance with the anti-bribery and anti-corruption regulatory framework poses a high risk, and DEMO has the right to take all necessary disciplinary measures to prevent and restrain such incidents. Committing a bribery entails not only civil but also criminal liabilities under the applicable laws, as well as termination of the employment relationship with the Company.
10. The person responsible for providing clarifications or advice on issues related to the Anti-Corruption & Anti-Bribery Policy is the Anti-Bribery Officer, who is the Director of Legal Affairs, Compliance & GDPR. The Company ensures the independence of the Regulatory Compliance Unit and the Anti-Bribery Officer.
11. The Company continuously trains, informs, and raises awareness among its employees on issues of corruption and bribery in order to foster a culture of compliance and encourages them to report incidents of corruption and bribery in good faith or with reasonable belief, without fear of retaliation.
12. The Company provides independent channels to all stakeholders to enable the proper reporting of incidents of corruption and bribery.
13. **Discounts and refunds** provided in connection with sales transactions involving the Company's products not be used as a means of bribery. All such payments and benefits must be lawful and fully documented in the corresponding transaction records, which shall be accurately maintained in the Company's financial books.
14. **Supply/Provision of Services:** The Company may address Health Professionals for the provision of consulting and other services directly related to their specialty. Any relevant cooperation/service provision must meet the criteria set out in the Company's relevant policy (MD-A-0003).
15. **Funding Health professionals' Attendance to Scientific Events:** Health professionals and organizations have the possibility to request financial or other support from DEMO for various types of scientific events. The Company may fund Health Professionals' attendance to scientific events, organized either by third-party organizations or by the Company itself and offer

hospitality, pursuant to the provisions of the law, the regulations of the SFEE Code of Ethics, provided that the criteria defined in the Company' s relevant policy are met (MS-A-0002).

16. **Sponsorships or donations** can be made only to organizations and not to persons, adhering to the provisions of the law, the provisions of the Hellenic Association of Pharmaceutical Companies (SFEE) Code of Conduct and provided that the criteria set out in the Company's relevant procedure (MD-A-0002) are met.
17. The Company complies with the guidelines and directives of the National Organization for Medicines (EOF) regarding sponsorships, donations and participation of healthcare professionals in conferences and with the Codes and guidelines of the Hellenic Association of Pharmaceutical Companies (SFEE).
18. The Company undertakes to ensure the continuous improvement of the effectiveness of the Anti-Bribery and Anti-Corruption Management System and establishes a specific framework of indicators for constant monitoring and improvement of the System.

## 5. FREQUENCY

This policy is applied in all cases and in particular during the Company's contacts with public officials or other similar stakeholders. Training in the policy, as well as review of its content, takes place every three (3) years or even earlier if this is deemed necessary.

## 6. RESPONSIBILITIES

### A) Actions of the BoD and CEO:

- To ensure that anti-corruption and anti-bribery issues are incorporated into the Company's strategy and objectives.
- To implement the anti-corruption and anti-bribery values and culture as expressed by this Policy and the Code of Ethics.
- To ensure the independence of the Compliance Unit and the Anti-Bribery Officer and their direct access to the BoD.
- To promote and create a culture of compliance on anti-corruption and anti-bribery issues according to the principles described in the Policy and the Code of Ethics.
- To guide the employees by his own example to apply the principles and values mentioned in the Code of Ethics and this Policy.
- To approve the present and related anti-corruption and anti-bribery policies.
- To encourage the employees to report issues related to this Policy and the Code of Ethics.
- To protect the employees who have made reports/complaints from retaliation measures.
- To ensure communication channels for reporting by all stakeholders.
- To ensure that ethical issues are taken into consideration when evaluating personnel.

### B) Actions of the Directors and Managers :

- To incorporate anti-corruption and anti-bribery requirements into DEMO's daily operations.
- To monitor the implementation of corruption and anti-bribery requirements and regulatory framework.
- To participate in the assessment of corruption and bribery risks and to propose preventive measures.

- To participate in and encourage company' s personnel to participate in training actions organized by the Compliance Unit.
- To promote and create a culture of compliance on anti-corruption and anti-bribery issues according to the principles described in this Policy and the Code of Ethics.
- To guide the employees, by their own example to apply the principles and values mentioned in the Code of Ethics and this Policy.
- To encourage the employees to report issues related to this Policy and the Code of Ethics.
- To conduct sponsorships and donations in compliance with the law, the provisions of the Hellenic Association of Pharmaceutical Companies (SFEE) Code of Conduct, and provided that the criteria set out in the Company's relevant procedure (MD-A-0002) are met.
- To engage Healthcare Professionals for the provision of consulting and other services directly related to their expertise, provided that the criteria set out in the Company's relevant procedure (MD-A-0003) are met.
- To ensure that no employee signs, submits, or allows others to sign or submit on behalf of the Company any document or statement where the employee knows or has reason to suspect that it is false or misleading

### **C) Actions of the Employees:**

- To implement this Policy as well as the Code of Ethics.
- To actively participate in awareness training organized by the Compliance Unit and the Anti-Bribery Officer.
- To report incidents they become aware of regarding deviations from the principles and values described in this Policy and the Code of Ethics.

### **D)Actions of the Anti-Bribery Officer:**

- To ensure through mechanisms the dissemination of regulatory obligations, values, and principles of the Code of Ethics and the Company's Anti-Corruption and Anti-Bribery Policy to the relevant executives and provide appropriate advice to them and the Management.
- To monitor the implementation of relevant procedures and be responsible for their updating.
- To ensure the protection of employees making reports from retaliation or other acts against them in collaboration with the Management.
- To develop and implement procedures for assessing information related to complaints on corruption and bribery issues, e.g., complaints, information from suppliers, from the staff.
- To participate in the drafting of policies related to the implementation of the Anti-Bribery Management System.
- To provide advice and clarifications to the staff regarding the issues of the Code and the Anti-Corruption and Anti-Bribery Policy.
- To be responsible for organizing training programs and raising staff awareness on anti-corruption and anti-bribery to ensure that all involved staff receive the required information and training.
- To issue reports related to corruption and bribery and the level of implementation of the Management System to the CEO and the BoD.
- To maintain direct communication channels with the CEO and the BoD.
- To participate in the identification, assessment and management of risks related to corruption and bribery.
- To define in collaboration with the Management and monitor performance indicators related to the company's performance in the implementation of the Management System.
- To evaluate due diligence questionnaires from partners/suppliers.

- To evaluate the suppliers/partners on corruption and bribery issues, on an annual basis, in collaboration with the Directors.
- To evaluate professional gifts received or offered by the company's staff.

## **7. PROCEDURE**

All DEMO employees must respect and apply all the above principles in their daily activities and especially during their contacts with public officials or other stakeholders. It should also be ensured that any third party who cooperates with or provides services to DEMO respect and follow the aforementioned principles.