



## Anti-bribery and Corruption Policy

for Redcare Pharmacy N.V.

Date | 01.11.2025

Version | 1.0

Confidentiality level | Public

## 1. Introduction

As a company built on trust and transparency, we, at Redcare Pharmacy, are committed to conducting our business with the highest standards of integrity. Bribery and corruption in any form are strictly prohibited.

## 2. Scope

This Anti-Bribery and Corruption (ABC-) Policy aims to prevent bribery and corruption in all areas of our operations and sets clear expectations for ethical conduct by all employees, suppliers, business partners and other stakeholders (“We”).

## 3. Definitions

**Bribery:** Offering, promising, giving, demanding or receiving anything of value (Bribe) to improperly influence an action or decision of a public or private party.

**Corruption:** Abuse of entrusted power for private gain.

**Gifts:** goods, free service, entertainment or hospitality, such as, but not limited to, donations, corporate branded items, cultural courtesies, business gifts, travel or accommodation associated with a business meeting, conference or event, business meals and refreshments, and tickets to sports, music concerts or cultural events.

**Facilitation Payments:** Small, unofficial payments made to speed up routine actions.

## 4. What does it mean for you?

### 4.1 We **never**:

- Offer, promise, pay, demand or accept Bribes, kickbacks or Facilitation Payments.
- Provide or accept Gifts or anything of value to influence a business or government decision.
- Make Facilitation Payments, even if customary in some regions.
- Conceal or misreport company payments or expenses.

### 4.2 **Gifts**

Offering or receiving Gifts is only acceptable if it is:

- i) Reasonable in value (not exceeding €50), and
- ii) Socially acceptable, proportionate, infrequent and not intended to influence, and
- iii) Transparent and reported to your manager.

Gifts with a value exceeding €50 can only be accepted after prior approval of the Compliance Officer. Approved Gifts will be recorded in the internal Gifts register.

The offering and acceptance of invitations for reasonable and appropriate business meals is allowed and does not require prior approval from the Compliance Officer.



Gifts of negligible value (e.g. notepads and pens, etc., which usually bear a company logo) and socially acceptable gifts such as, invitations to meals, invitations to cultural events and sporting events, and gifts for Christmas and birthdays as well as Gifts as a token of appreciation for your specific contribution such as giving a presentation or lecture (e.g. bottle of wine, flowers, book) with a value not exceeding €50, are acceptable.

Gifts which are always prohibited are:

- Gifts of cash
- Tobacco products
- Gifts where you feel you need to do something in return
- Excessive or offensive hospitality

Prior to offering a Gift, please ensure that the third-party is entitled to accept our Gift in line with their applicable policy. Respect if they decline our Gift. Gifts must always be properly recorded in the Company's financial books.

#### **4.3 Dealing with Public Officials**

Interactions with public officials require extra caution:

- We do not offer, grant or promise Gifts to public officials.
- We never make Facilitation Payments to speed up administrative tasks.
- All contacts with public officials should be professional, legal, and documented.

#### **4.4 Working with Third Parties**

- We only work with third parties and partners who share our ethical standards as laid down in our Supplier Code of Conduct.
- We perform due diligence before onboarding supplier, contractors or other partners.

#### **4.5 Keeping Records**

All financial records must be:

- Accurate, complete, and up to date.
- Supported by valid documentation.
- Free of hidden payments or "off-the-books" accounts.

## **5. Questions**

If you are in doubt, please reach out to the Compliance Officer.

## **6. Speak Up**

We encourage everyone to speak up whenever (you suspect) someone who violates this ABC-Policy.

It's our joint responsibility to raise any concerns about actual or potential violations of laws and regulations, policies and procedures as well as any other suspected irregularities. By reporting misconduct, we are helping to protect our company.

Consult our Speak Up Policy for the different channels you may go to in order to report your concern and which, as a last resort, also allows for the possibility to report concerns anonymously.

We respect and take matters seriously whenever concerns about improper behaviour are being reported. We will not retaliate or allow retaliation against anyone who, in good faith, reports a potential violation of this ABC-Policy.

## 7. Miscellaneous

Non-compliance with the provisions of this ABC-Policy may lead to internal disciplinary measures, including but not limited to dismissal and administrative sanctions, or could result in civil or criminal penalties. If the law prescribes a stricter rule, restriction or obligation than a provision of this ABC-Policy, the stricter rule, restriction or obligation prevails.

This ABC-Policy may be amended and/or supplemented from time to time with an effective date so specified.

This ABC-Policy is effective as per 1 November 2025 and replaces our Provision and Acceptance of Gifts Policy.