

ANTI-BRIBERY POLICY

I. INTRODUCTION

Bribery is a criminal offense and is strictly prohibited by our Company. We expect strict compliance with the highest ethical standards and anti-bribery laws from all individuals associated with our business. Upholding integrity and transparency is paramount to us, and we maintain a zero-tolerance stance against any form of corrupt activities, whether initiated by our employees or third parties acting on behalf of the Company.

2. POLICY

It is expressly prohibited, both directly and indirectly, for any employee or individual acting on our behalf to offer, give, request, or accept any form of bribe, including gifts, loans, payments, rewards, or advantages, whether in cash or any other form of inducement. This prohibition extends to interactions with any person or company and aims to prevent the seeking of commercial, contractual, or regulatory advantages for the Company, or the pursuit of personal advantages in an unethical manner.

3. SUSPICION

If there is a reasonable suspicion that an employee has committed an act of bribery or attempted bribery, an investigation will be conducted. In alignment with our disciplinary procedure, appropriate actions may be taken, including dismissal or termination of our business relationship.

4. REPORTING

Employees, suppliers and customers are obligated to report any suspected acts of bribery, whether personally involved or not, to a Director. A written account of events may be requested. The Company's Whistleblowing Policy, available in the company Employee Handbook, should also be referenced for guidance.

5. GIFTS AND HOSPITALITY

While acknowledging the industry's customs, where the exchange of gifts and hospitality is a reflection of friendship or appreciation, such actions must be proportionate and properly recorded. Prior written approval from a Director is mandatory for any gifts or hospitality offered by our employees or individuals working on our behalf. Similarly, accepting any gifts or offers of hospitality requires prior written approval from a Director.

6. RECORD KEEPING

Every instance of giving or receiving gifts or hospitality will be documented. This record-keeping ensures transparency and compliance with our anti-bribery policy.

Please note: As laws are subject to change, this policy is periodically reviewed, and the Company reserves the right to amend it without prior notice.

For further information about this policy or to report an act of Bribery, please contact HR@meridian-medical.com