



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. OBJECTIVE

The present Anti-Bribery and Anti-Corruption Policy has as its fundamental objective to reiterate MEDGAZ's commitment to strict compliance with the regulations for the prevention and fight against corruption, systematizing the principles and values that govern the Code of Ethics and MEDGAZ conduct.

2. SCOPE

The Anti-Bribery and Anti-Corruption Policy is applicable to all employees, managers, members of the board of directors and members of the MEDGAZ's Board of Directors, hereinafter "members of the organization", whatever their position, type of contract or geographic location where they perform their functions and personnel acting on behalf of or representing the Company. All members of MEDGAZ's organization undertake to know and comply with this Policy.

3. COMMITMENTS

MEDGAZ prohibits offering, promising, giving, receiving, or authorizing others to give or receive anything of value, either directly or indirectly, to any person with the objective of improperly influencing, obtaining or retaining business.

3.1 Relationship with public officials

MEDGAZ bases its relations with the public sector on the principles of compliance with legality, integrity, honesty and transparency, and discards any action aimed at obtaining an undue advantage, in the market or in public contracts, which is based on any kind of act of corruption or contrary to applicable law.

In this sense, to avoid any conduct that may constitute bribery or attempted bribery, extortion, influence peddling, in relation to public officials, it is prohibited to offer or deliver any type of payment in cash, in kind or other gifts that may be constitutive of these crimes, to obtain a direct or indirect benefit, for the COMPANY or for the people subject to this Policy.



- A public official shall be understood as the persons who:
 - a) are defined as public officials in the law;
 - b) hold a legislative, administrative or judicial job of any kind, whether appointed or elected;
 - c) they exercise a public function;
 - d) are officials or agents of a public international organization. This includes employees and officials of state-owned companies.
 - e) hold a legislative, administrative or judicial position in a country of the European Union or any other foreign country, both by appointment and by election.

- Facilitation payments:

Facilitation payments are small amounts that are paid to a public official to expedite the execution of a routine administrative action to which the payer is entitled. They are intended to stimulate public officials to carry out their duties, for example, the issuance of an authorization or a permit. They are often paid in cash.

MEDGAZ prohibits this type of payment. In cases of doubts as to whether a payment is a facilitation payment, the Ethics Committee should be consulted.

3.2 Relationship with third parties

MEDGAZ bases its relationships with clients, suppliers and subcontractors on the commitment to guarantee excellence in the provision of services and operations. To avoid any conduct that may constitute bribery or attempted bribery, in relation to clients, suppliers and subcontractors, whether directly or indirectly, any type of offer or acceptance of gifts, hospitality or payments that may constitute these crimes is prohibited.

3.3 Due diligence and third parties

MEDGAZ may be responsible for acts of corruption carried out by third parties (Suppliers, business partners, subcontractors, advisers, consultants, auditors, etc...).

Before working with a third party, MEDGAZ employees must apply due diligence and a risk assessment on this third party to learn about their background and reputation, as well as to be aware of any bribery and corruption risks that may exist.



3.4 Relationship with political parties

MEDGAZ will always comply with the national and international regulations on the financing of political parties.

To avoid any conduct that may constitute illegal financing, in relation to political parties, political positions or unions (or the organizations, associations or foundations linked to them), any type of donation or economic contribution that may be constitutive of these is prohibited.

3.5 Sponsorships, donations and contributions to NGOs, foundations and other entities

Sponsorship projects, donations and contributions of a charitable, sporting, cultural or similar nature must be duly documented, including the motivation to participate in them. If participation in such projects is decided, MEDGAZ must:

- Perform an analysis for the prior approval of the entity that will receive the funds.
- Verify that this contribution is not violating current regulations or the internal regulations of MEDGAZ.

3.6 Travel and representation expenses

The travel and representation expenses incurred by the members of MEDGAZ's organization will be reasonable and will be aligned with the "Travel Procedure", with local uses and standards, and where appropriate, with the legislation.

In no case shall the activities associated with travel and representation expenses constitute any act of corruption or bribery.

Travel and representation expenses must be documented so they can be reviewed.

3.7 Gifts and business entertainment

Often offering or accepting small gifts or business entertainment is part of local tradition or culture.

In this sense, the members of MEDGAZ's organization are prohibited from offering, delivering, requesting, accepting a gift in the exercise of their professional activity that is outside the reasonable limits for common business practice, except in the case of merchandising that incorporates the distinctive sign of the COMPANY.



Members of the organization should consult with the Ethics Committee when in doubt as to whether a gift, business courtesy, or gift is appropriate.

4. COMMUNICATION OF BREACHES

In order for the members of the organization to report possible breaches or concerns of this Policy and the MPDD, they may contact MEDGAZ's Ethics Committee, through the email address: ethics@medgaz.com and the contact form in the web: www.medgaz.com.

The imperative nature of this Policy, failure to comply with any provision will entail disciplinary sanctions in the terms established in the sanctioning regime provided for in MEDGAZ's Code of Ethics and Conduct.

5. ACCEPTANCE OF THE ANTI-BRIBERY & ANTI-CORRUPTION POLICY

All members of MEDGAZ's organization to whom this Policy applies, as well as the members of the organization who join or become part of it, accept expressly the entire content of this Policy.

6. VALIDITY AND UPDATING OF THE ANTI-BRIBERY & ANTI-CORRUPTION POLICY

The Anti-Bribery and Anti-Corruption Policy has been approved by MEDGAZ's Board of Directors on 15 December 2021, entering into force from the moment of its approval and being fully in force as long as there is no modification in it.

The modifications made to the Anti-Bribery and Anti-Corruption Policy will be approved by the Board of Directors, at the proposal of the Ethics Committee, and will be applicable from the day after they are communicated to all persons affected by it.