



COMPLIANCE POLICY

1. OBJECTIVE

The objective of the MEDGAZ Compliance Policy is to define the guidelines and main commitments adopted by the organization regarding regulatory compliance, which must guide behaviour in all its areas of action and in the achievement of its business objectives.

This Policy expresses the will of the MEDGAZ Board of Directors and Management team to maintain a respectful conduct in accordance with the highest standards, values and ethical principles that guide the behaviour of all persons in the organization while performing their professional activity.

2. SCOPE

The Compliance Policy is applicable to all employees, managers, members of top management and members of the Board of Directors of MEDGAZ, hereinafter “members of the organization”, regardless of their position, type of contract or geographical location where they carry out their functions, and personnel acting in the name of or on behalf of the Company.

3. RESPONSIBILITIES

- Board of Directors.

The MEDGAZ Board of Directors is the ultimate administration and representation body of the company and, consequently, has the maximum responsibility for any legal act.

It is responsible for approving the strategic guidelines and policies that contain the guidelines that govern the company's actions related to the regulatory compliance and crime prevention system.



- Committee of Ethics and Compliance

It is the body designated by the Board of Directors, with autonomous powers of initiative and control, for the supervision of the operation and compliance of the MEDGAZ Crime Prevention System, as well as for the transmission, promotion and supervision of compliance with the MEDGAZ Code of Ethics and policies.

It is responsible for periodically reporting to the Board of Directors on the operation and compliance of the Crime Prevention System.

- General Management

MEDGAZ General Management contributes to the creation of a Compliance Culture in the company, promoting knowledge and compliance with the Compliance Policy by all employees.

- Personnel

All members of MEDGAZ organization have the obligation to be acquainted and comply with the Compliance Policy and must contribute to creating and maintaining a true Compliance Culture within the organization.

They must report concerns and possible infractions or criminal conduct through the channels established for this purpose.

4. PRINCIPLES AND COMMITMENTS

MEDGAZ carries out its activity ensuring respect for and compliance with applicable regulations in all its areas of action, and under this premise it has acquired its main commitments regarding compliance:

- Promote, at all levels of the organization, knowledge and respect for applicable regulations, maintaining a Culture of Compliance and “zero tolerance” against irregular or illicit actions.
- Develop a system that allows identifying, evaluating and managing the risks of non-compliance that may occur in MEDGAZ's activities and services, as well as establishing control measures and integrating them into the organization's processes, through policies and procedures.



- Provide training and awareness to all staff on matters related to compliance, as well as, where appropriate, to third parties related to MEDGAZ.
- Promote self-control processes in the actions and decision-making of MEDGAZ members under four basic premises: (i) that the action complies with the Code of Ethics and Conduct; (ii) that is legally valid; (iii) that it is aligned with the company's strategic objectives; (iv) that it is within the scope of its competences and that, therefore, it must assume responsibility for it.
- Establish the necessary due diligence measures for an adequate selection and monitoring of ethics and compliance regarding business partners or third parties with whom MEDGAZ maintains or intends to maintain relationships of any nature.
- Raise awareness among Company members of the importance of communicating conduct that does not meet MEDGAZ standards of good practices and compliance, enabling for this purpose an adequate communication channel that guarantees their independence, confidentiality and absence of reprisals for the complainant and the rights of the persons investigated.
- Inform the members of the organization of the policies and procedures that apply to them in the development of their functions, as well as the consequences of non-compliance.
- Ensure the establishment and compliance of a disciplinary system that sanctions conduct contrary to applicable regulations, ensuring its equitable, proportional and fair application.
- Cooperate with judicial, administrative bodies or any national or international supervisory body to ensure compliance with legal obligations by MEDGAZ.
- Periodically evaluate the design and performance of the Compliance management system, as well as the effectiveness of the established controls, to minimize the risk of non-compliance.
- Supervise the Compliance management system to ensure its correct functioning, implementing any changes and improvement opportunities that are necessary.



5. APPROVAL, VALIDITY AND UPDATE

The Compliance Policy has been approved by the MEDGAZ Board of Directors on 20 June 2025, effective from the moment of its approval and being fully valid if there is no modification thereof.

The updates made to this Policy will be approved by the Board of Directors, at its own proposal or by the Committee of Ethics and will be applicable from the day after their communication to all people affected thereby.

Approved by

Board of Directors

20 June 2025