



**ANTI-CORRUPTION POLICY OF
HEALTHCARE ACTIVOS**

VERSION CONTROL

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1. OBJECTIVE

Healthcare Activos is firmly committed to integrity, transparency and respect for legality in all its operations and relationships with third parties. Corruption is a serious obstacle to economic development, negatively affecting society, the legal system and the rule of law, so Healthcare Activos has implemented a policy of "zero tolerance" to any action that could be considered corruption or bribery, both active and passive.

Healthcare Activos' anti-corruption policy (the "**Anti-Corruption Policy**") is primarily intended to set out the guidelines and procedures that Healthcare Activos implements to prevent, detect, mitigate and manage the risks of corruption and bribery. Healthcare Activos is committed to ensuring that all day-to-day decisions and actions are made in an ethical and responsible manner, complying with all anti-corruption laws and regulations, including Organic Law 10/1995, of 23 November, of the Criminal Code, and other applicable national and international legislation and regulations.

The Policy is also closely aligned with and develops Healthcare Activos' Code of Ethics and Best Practices, which establishes the principles and standards of conduct that all members of the organisation must follow. Together with the Information Management Procedure, approved under Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption and whistleblower protection, it makes explicit and demonstrates Healthcare Activos' commitment to establish and promote a corporate culture of ethics, honesty and transparency.

2. SCOPE OF APPLICATION

This Policy applies to:

- Healthcare Activos Management, S.L. ("**HAM**") and all the companies that at any given time make up its Group of companies, as defined in article 18 of the Spanish Capital Companies Law, regardless of their geographical location.
- The directors of HAM and those of all the companies comprising its Group of companies.

Healthcare Activos will also ensure that third parties providing services to or collaborating with the Group (partners, suppliers, consultants, etc.) apply and respect the principles set out in this Policy, maintaining the Group's ethical standards.

Interactions and transactions with the Group's clients are also subject to this Anti-Corruption Policy, ensuring that all activities are conducted in an ethical manner and in accordance with Healthcare Activos' internal regulations.

This Policy is applicable in all jurisdictions where Healthcare Activos has subsidiaries or branches. In the event of any discrepancy between this Policy and the local regulations of any subsidiary and/or branch, the matter will be referred to Healthcare Activos' Administration and Control Committee, of which the Compliance Officer is also a member, to determine whether the Anti-Corruption Policy should be amended.

3. RULES AND ACTION GUIDELINES

3.1. Prohibited conduct

Healthcare Activos adopts this Anti-Corruption Policy to set a zero-tolerance standard for all forms of corruption and bribery.

In order to prevent corruption and bribery, Healthcare Activos is committed to carrying out all its activities in accordance with current anti-corruption and bribery legislation and applying it to all its areas of activity and processes, as well as in all the countries where it operates. To this end, Healthcare Activos expressly and strictly prohibits the following conduct:

- i. Bribery: Promising, offering, giving or facilitating a gift, remuneration, favour or service to an authority, official or public employee, national or foreign, directly or through intermediaries or persons linked to them, in order that they perform an act or take a decision contrary to the duties inherent to their position, or to omit or delay without justification an act of their own, all for the benefit of Healthcare Activos.

It is also forbidden to accept a request for the delivery of the above-mentioned gifts, remuneration, favours or services from a public authority, official or employee.

- ii. Corruption between private parties: Promising, offering, giving, receiving, soliciting or accepting an unjustified benefit or advantage, directly or indirectly, of any nature whatsoever, as consideration for favouring or receiving undue favours from the other party in the procurement of services or in business relations.
- iii. Influence peddling: Exerting influence, directly or indirectly through an intermediary, over an authority, official or public employee, national or foreign,

taking advantage of a prior personal relationship with that person, with the aim of obtaining a decision beneficial to the interests of Healthcare Activos.

- iv. Extortion: Using violence or intimidation to obtain an undue advantage for Healthcare Activos from another person to the detriment of its assets or those of third parties. Blackmail is considered extortion for these purposes.
- v. Facilitation payments: Small payments of modest amounts offered or given to authorities, public officials or employees, as well as employees of a private company, national and foreign, in order to obtain a favour for Healthcare Activos (speeding up a procedure, obtaining a service, licence, etc.).
- vi. Fraud in books and records: Making false, misleading or artificial entries in the Group's books and records that conceal any form of corruption or influence peddling.

Healthcare Activos shall at all times adopt the appropriate measures to ensure that the relations of the Group's directors, managers and employees with any authority, civil servants or public employees, as well as with any company or individual, are governed, in all cases, by the principles of cooperation, transparency and honesty.

Healthcare Activos also has specific procedures to detect, mitigate and manage any action that could be considered an act of corruption, the application of which will be supervised by the Compliance Officer. A description of the anti-corruption control processes is provided in section 4.

3.2. Gift Policy

3.2.1. Requirements

Without prejudice to the provisions of section 3.1. above, and subject to the limits set out in section 3.2.2., receiving or accepting gifts customary in business relations, as well as any other legitimate form of expenses or hospitality are permitted, provided that they comply with the following requirements:

- i. They comply with applicable legislation and Healthcare Activos' internal regulations.
- ii. They are made or received transparently, openly and not secretly, and always in the workplace.
- iii. They do not include cash or cash equivalents (gift cards or prepaid vouchers).

- iv. They should be of symbolic and reasonable value, and be congruent with the position of the recipient, the circumstances and the occasion on which the gift is given or received.
- v. They are related to a legitimate and verifiable business purpose and are not made or received repeatedly.
- vi. They are not intended to influence the persons to whom they are addressed, nor can they be considered a bribe by the recipient or third parties.
- vii. They are made or received at times when no relevant decisions are being made that affect the business relationship between Healthcare Activos and that third party.
- viii. They do not give reasonable grounds to be considered improper.
- ix. Where applicable, they are accurately and precisely recorded in Healthcare Activos' books and records.

Healthcare Activos' officers and employees who intend to give or receive a gift must first consider whether the gift meets the requirements set out in this section, and whether the giving or acceptance of the gift may compromise their independence, integrity and honesty or that of the recipient.

All officers and employees of Healthcare Activos must consult the Compliance Officer in case of any doubt.

3.2.2. Limits on gifts and hospitality

A limit of €150 (ONE HUNDRED AND FIFTY EUROS) is set for the acceptance and offering of gifts and hospitality. In the case of gifts and hospitality to authorities and public officials, only those of irrelevant value may be offered or received.

Above this limit, the offering of gifts must be requested in writing to the Compliance Officer and will be authorised by the Administration and Control Committee.

The receipt of gifts or hospitality in excess of the stated limit is not acceptable and must be immediately refused and returned. Gifts and hospitality above the established limit may only be accepted when they fall within the scope of possible acts of representation by officers and members of the management bodies of Healthcare Activos. In any case, such gifts and hospitality must also be reported to the Compliance Officer for his knowledge and registration in accordance with section 3.2.3.

In the event that the gifts received cannot be returned, the Administration and Control Committee shall decide to whom they will be donated, with priority being given to purposes of social interest.

As regards hospitality, including lunches, dinners, etc., to be held with third parties, they must comply, both to be offered and received, with the requirements established

in section 3.2.1., must not exceed the limit established in section 3.2.2. and must be directly related to the business and of an appropriate value and proportionate to the position or function of the participants.

3.2.3. Gift and hospitality registry

Healthcare Activos' Compliance Officer will keep a record of all gifts and hospitality offered and received, whether or not they exceed the limit set out in section 3.2.2. of this Anti-Corruption Policy. All employees and officers of Healthcare Activos are required to report to the Compliance Officer all gifts and hospitality offered or received.

Gifts and hospitality of irrelevant value are exempted from registration: stationery, merchandising - unless their value exceeds what is traditionally expected of such products -, and invitations to coffee, refreshments, etc.

Apart from these exceptions, the Compliance Officer shall include in the register the identity of the giver and receiver, economic valuation, justification in the event that the established economic limit is exceeded and destination in the event that the gifts and hospitality must be rejected and cannot be returned.

3.3. Contributions to political parties, charitable donations and sponsorships

3.3.1. Contributions to political parties

Direct or indirect contributions or donations, regardless of their amount or form, to political parties, federations or groups of voters are strictly prohibited. Contributions and donations to foundations or entities linked to or dependent on political parties are also prohibited.

3.3.2. Charitable donations and sponsorships

All charitable donations and sponsorships made by Healthcare Activos must be in line with its strategy, sustainability and corporate social responsibility. Specifically, they must follow criteria of reasonableness, proportionality and prudence, taking into account the circumstances in which they are made.

Healthcare Activos will only make donations or sponsor foundations, entities or non-governmental organisations that have a consolidated and recognised track record, that are duly registered in the corresponding Registers and that can accredit the performance of the social action that is the object of the donation or sponsorship.

Donations or sponsorships that could be construed as having the purpose of conditioning business relationships, or that could improperly benefit Healthcare Activos, are prohibited.

All donations and sponsorships in excess of €3,000 (THREE THOUSAND EUROS) must be approved by the Administration and Control Committee of Healthcare Activos and be faithfully and accurately recorded in its books and records.

3.4. Conflicts of interest

This Anti-Corruption Policy also aims to provide all officers and employees of Healthcare Activos with guidelines to identify, prevent and mitigate potential conflicts of interest that may arise as a result of their activities.

Conflicts of interest are a corruption risk, which must be managed to ensure that decision-making is not influenced or interfered with by personal interests contrary to the best interests of Healthcare Activos, its Code of Ethics and Best Practices and other internal policies.

Conflict of interest situations may be real, potential or apparent and cover a wide range of situations or circumstances, including, but not limited to:

- i. Use confidential information accessed by reason of the functions performed for Healthcare Activos for personal gain.
- ii. Take advantage of the position held in Healthcare Activos for personal or third party gain.
- iii. Participate in the negotiation of any agreement between Healthcare Activos and a related person (close family members, persons with whom a personal relationship exists, controlling legal persons, or persons acting on behalf of such manager or employee).
- iv. Be a shareholder or director of a company that may become a supplier or maintain any business relationship with Healthcare Activos.
- v. Participate in a selection process for a job position in Healthcare Activos in which a person related to that officer or employee has applied.

In the event that an officer or employee of Healthcare Activos is or believes himself or herself to be in a conflict of interest, he or she must refrain from participating in any way in the process or decision in which the conflict has arisen.

They must also immediately inform their manager and the Compliance Officer in writing of the existence and nature of the conflict. They must also inform when they are not yet involved in a conflict of interest situation, but notice or anticipate that it may arise, or if they have any doubts about the possibility of being involved in such a situation.

The Compliance Officer shall document the description of the conflict of interest, the persons involved, the proposed management of the conflict and the resolution of the conflict, so that there is a transparent record.

The resolution of the conflict of interest corresponds to the manager to whom the existence of the conflict has been reported, together with the Compliance Officer. Both will carefully assess the communication made and will communicate their reasoned decision to the affected officer or employee in the shortest possible time.

The information provided in the conflict of interest disclosure shall always be treated in strict confidence.

4. DUE DILIGENCE MEASURES

4.1. Contracting with third parties

The contracting of suppliers, intermediaries, business partners or any third party shall at all times comply with the strictest due diligence measures aimed at preventing corruption.

Healthcare Activos applies the principles of transparency, efficiency, concurrence, equality and legality in its contracting processes, with contracts and services being awarded to the bidder that submits the best offer, all in accordance with the processes implemented.

Healthcare Activos has also implemented a Supplier Identification Policy, which establishes due diligence measures prior to establishing business relationships with its suppliers, allowing it to evaluate their history and background to ensure that they have a solid reputation and comply with Healthcare Activos' standards of integrity and ethics. In addition, recurring suppliers will be monitored on a regular basis to ensure that the information available is up to date.

Healthcare Activos also promotes appropriate measures to ensure that suppliers, intermediaries, business partners or any third party comply with the Group's internal policies on corruption and bribery.

In the event that the Compliance Officer detects in the course of any supplier identification process any circumstances that could infringe Healthcare Activos' Code of Ethics and Best Practices or damage the reputation of the Group, such circumstances shall be documented in the existing Supplier Identification Procedure Register.

The Compliance Officer shall also report the matter in detail to the Administration and Control Committee, which shall decide whether (i) the detailed circumstances justify the non-contracting of such supplier, or (ii) approve the contracting of the supplier if

it considers that there is congruence between the knowledge of the supplier, the purpose of the provision of the services and the reasonableness and economic logic of the services. In the latter case, the Compliance Officer must regularly monitor the supplier with enhanced due diligence measures.

4.2. Due Diligence measures applicable to clients

HAM provides services to Healthcare Activos Yield SOCIMI, S.A. (“**HA Yield**”), as well as to Healthcare Activos Yield 2 SOCIMI, S.A. (“**HA Yield 2**”), together with their respective groups of companies, pursuant to the corresponding management agreements.

In accordance with the due diligence principles and standards already applied to the clients of HA Yield and HA Yield 2 under the corresponding management agreements, who qualify as obliged entities under the applicable legislation on the prevention of money laundering and terrorism financing, HAM has established an internal procedure for the identification and knowledge of all HA Yield and HA Yield 2 group companies to which it provides services. Such procedure includes the verification of the legal existence of each subsidiary, its corporate structure, basic registry data, the identity and capacity of its representatives, and the identification of its beneficial ownership, all of this being carried out under a risk-based approach and in a manner proportionate to the nature of the relationship.

Taking into account the aforementioned management agreements, compliance by HAM with this identification procedure and the knowledge of its clients is carried out on an ongoing and continuously updated basis throughout the entire contractual relationship. Execution of the management agreements entails permanent interaction with HA Yield, HA Yield 2 and their respective subsidiaries, recurrent access to relevant corporate and operational information and periodic reviews of the applicable perimeter, enabling HAM to maintain at all times adequate and up-to-date knowledge of the entities to which it provides services, in line with the principles of transparency, integrity and corruption risk prevention.

4.3. Audit and control

Healthcare Activos regularly carries out internal and external audits and controls of its financial and commercial activities, as well as compliance with the requirements of applicable legislation and its internal regulations, all of which are supervised by the Compliance Officer.

Specifically, with regard to the internal control model for financial reporting, Healthcare Activos undergoes an annual independent external audit, *International*

Standard on Assurance Engagements No. 3402" (ISAE 3402 Type II Report), which examines the operational effectiveness of the controls implemented.

The Group's organisational structure is also designed so that decision-making is carried out autonomously and independently through specific Committees formed by Healthcare Activos' officers and employees who carry out these functions, and in all cases in strict compliance with the processes and standards of obligatory compliance ("NOC") implemented.

5. TRAINING

In order to foster an ethical culture within Healthcare Activos, and in accordance with the annually approved Training Plan, the Group offers regular anti-corruption and anti-bribery training sessions to all Group officers and employees, provided by external providers with sufficient training and expertise in the field.

The training sessions are managed by the Compliance Officer, who keeps evidence of the subsequent evaluation of all officers and employees of the knowledge acquired in these training sessions.

The training offered by Healthcare Activos to all its officers and employees aims to prevent or mitigate conduct contrary to applicable regulations or the Group's internal policies or that may pose a reputational risk, as well as training to identify risk situations and provide tools to manage and mitigate these risks effectively.

6. INTERNAL INFORMATION SYSTEM

In compliance with Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, Healthcare Activos has implemented an Internal Information System, documented through the Information Management Procedure.

Through the Internal Information System, available at healthcareactivos.integrityline.com, all officers, employees or third parties who maintain business relationships with Healthcare Activos must report any potential breach of current legislation and/or the Group's internal regulations, as well as any suspicion of corrupt conduct or practices. The Information Management Procedure details the handling, investigation and resolution of reports received through the Internal Information System.

Healthcare Activos also states that it guarantees the confidentiality and anonymity of the informant, should he or she wish and prohibits any form of retaliation or threat of

retaliation against persons who report in good faith any suspected unlawful, corrupt or irregular conduct or practice, even if it is subsequently proven to be unfounded.

Healthcare Activos has appointed the Compliance Officer as System Manager, who will carry out his functions independently and autonomously.

7. COMMUNICATION

The communication of this Anti-Corruption Policy, as well as any other internal policies or regulations approved in relation thereto, shall be the responsibility of the Executive Chairman or a Co-CEO.

The latest versions of all Group policies and internal documentation are available at all times to all officers and employees via the Healthcare Activos intranet in the relevant sections.

Any questions regarding the application of this Anti-Corruption Policy should be directed to the Compliance Officer.

8. REVIEW AND UPDATE OF THE ANTI-CORRUPTION POLICY

The Compliance Officer is in charge of annually reviewing the implementation of and compliance with this Policy and reporting the results to the Board of Directors.

Likewise, within the framework of its periodic review to ensure that it reflects the recommendations and best international practices at all times, the Compliance Officer will propose to the Directors of HAM the modifications and updates that contribute to its development and continuous improvement.

9. APPROVAL, ENTRY INTO FORCE AND SUBSEQUENT UPDATES

The first version of the Anti-Corruption Policy was approved by the Directors of Healthcare Activos Management, S.L. at its meeting of 26 October 2023, coming into force as of that date.

Subsequent amendments and updates approved by the Directors shall be recorded in the Version Control of this Anti-Corruption Policy.