

Policy

Anti-bribery and corruption policy

Policy Statement

Welltec recognises that bribery and corruption have a detrimental effect on communities wherever they occur. Bribery is a criminal offence in most countries in which Welltec operates, and corrupt acts expose Welltec and its employees to the risk of prosecution, fines and imprisonment, and reputational harm.

It is Welltec's policy to comply with all anti-bribery and corruption laws of the countries in which we do business.

Following the introduction of the UK Bribery Act 2010, Welltec has implemented "adequate procedures" that are rigorously applied and reviewed to ensure full compliance.

It is Welltec's policy to maintain the highest level of ethical standards in the conduct of its business affairs and Welltec has a zero tolerance of bribery and corruption. This policy has been adopted by the Welltec's Board of Directors and is communicated to all relevant parties.

Scope

Welltec's zero tolerance of bribery and corruption applies to all its officers, directors and employees as well as any agents, contractors, representatives or any other parties acting on behalf of Welltec or its subsidiaries, of which Welltec has effective control, globally.

Welltec expects our business partners, suppliers and contractors to act with integrity and refrain from any actions involving bribery and/or corruption. Where appropriate, contractual clauses reflecting this requirement are included.

Statement of prohibited conduct

Welltec prohibits:

- the offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement,
- to or from any person or company, wherever they are situated and whether a public official or body or private individual or company,
- by any employee, agent or third party acting on Welltec's behalf,
- in order to gain any commercial, contractual or regulatory advantage for Welltec in an unethical way
- or in order to gain any personal advantage, financial or otherwise, for the individual or a third party connected with the individual.

This includes any inducement intended to influence the recipient to act contrary to the interests of Welltec or their own organisation.

Expectations of staff and management

All employees are responsible for preventing, detecting, and reporting bribery and corruption. The CEO holds ultimate responsibility for implementation of this policy and demonstrates the Board's commitment.

Reporting mechanisms

Welltec provides confidential channels for reporting concerns:

- Whistleblower system (anonymous reporting possible),
- Internal reporting system via direct manager, AVP, head of function, local HR or Legal function.

These mechanisms are available to all employees and external stakeholders. All reports are handled confidentially, and whistleblowers reporting in good faith are protected from retaliation.

Investigation process

All allegations are reviewed initially jointly by HR and Legal. If substantiated, an investigation is launched involving evidence gathering, interviews, and analysis. Investigations are:

- Conducted promptly and impartially,
- Documented and reported to relevant management or legal authorities,
- Followed by appropriate disciplinary or legal actions.

Whistleblower protection

Welltec strictly prohibits retaliation against anyone who raises concerns in good faith. Employees who retaliate against whistleblowers will face disciplinary action, including possible dismissal.

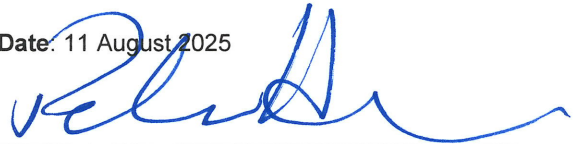
Training and awareness

All employees must undergo anti-bribery and corruption training at onboarding and at regular intervals. Welltec's Code of Conduct, which outlines our position on bribery and corruption, is publicly available to third parties via the corporate website.

Monitoring and review

This policy is reviewed at least every three years or upon significant legal or business changes. The head of Legal function oversees its effectiveness and proposes updates for Board approval.

Date: 11 August 2025



Peter Hansen, CEO
For and on behalf of Welltec