



Anti-Bribery Policy / Latin Health Group

1.OBJECTIVE

To establish the commitment of Grupo Salud Latina S.A and its Senior Management to prevent, detect, and sanction bribery and any form of corruption, ensuring compliance with the ISO 37001 and applicable national laws.

2.SCOPE

This policy applies to:

- All employees of the organization (permanent, temporary, and contracted).
- Chief Executive Management, management, and middle management.
- Suppliers, contractors, distributors, and strategic partners.
- Interactions with clients in both the public and private sectors, especially with hospitals, clinics, and government entities.

3.GUIDING PRINCIPLES

3.1 At Grupo Salud Latina S.A, has established the following guiding principles, which represents the company's commitment and are fundamental to ensuring integrity, transparency, and responsibility in all operations.

- **Zero Tolerance:** All forms of bribery, whether direct or indirect, are prohibited, including improper payments, gifts, favors, or benefits intended to influence decisions, as described in the **GN-R-01 Code of Ethics**.
- **Regulatory and Ethical Compliance:** The organization complies with a Matrix of applicable legal requirements and acts in accordance with Law No. 8422 against Corruption and Illicit Enrichment in Public Office, Law No. 9699 on the Liability of Legal Entities for Domestic Bribery and Transnational Bribery, General Public Procurement Law No. 9986, the ISO 37001 Anti-Bribery Management Systems standard, and the provisions of the internal Ethical Compliance Procedure.
- **Business Integrity:** All financial and non-financial transactions must be recorded, authorized, and verifiable.
- **Prevention of Conflicts of Interest:** Employees must declare relationships that may influence their objectivity, as established in the Ethical Compliance Procedure.
- **Whistleblowing and Reporting Channel:** the organization guarantees a secure, confidential, and retaliation-free channel for reporting irregularities, as stipulated in procedure **GN-PR-006 Ethical Compliance and Complaint Management Procedure**.
- **Continuous Improvement:** The Anti-Bribery Management System, including its policy, will be periodically reviewed and updated as part of the continuous improvement process and in compliance with the requirements established by the ISO 37001 standard.

4.FUNDATIONS OF THE ANTI-BRIBERY POLICY

- 4.1 The company manages the scope of its operations solely through the legal channels and mechanisms that exist for such purposes, always guided by the highest principles of ethics, integrity, and transparency.
- 4.2. It is strictly prohibited for any company employee or subcontractor to offer or receive any form of compensation, regardless of whether the act is actually carried out, for performing, failing to perform, or delaying duties inherent to their role, or for sharing company information, information about competitors, employees, or representatives. This is prohibited in any field of interaction, whether public or private, whether or not related to participation in public tenders or any type of contract.
- 4.3.Compensation is understood as improper or unjustified payments, gifts, favors, donations, or benefits intended to influence decisions, whether directly or indirectly, in favor of company employees or third parties.
- 4.4.This prohibition includes any conduct considered bribery, illicit enrichment, or offenses related to public officials under Costa Rican legislations.
- 4.5. All personnel may request guidance and report, in good faith or on the basis of a reasonable belief, any attempted, suspected, or actual events that may violate this policy. The following email address is available for requests and reports: denuncias@latinhg.com.
- 4.6.Reports will be handled confidentially and may be submitted anonymously where permitted by law. Retaliation, discrimination, or disciplinary measures against anyone who reports or refuses to participate in an act of bribery are prohibited, except for any consequences arising from their own participation in a violation.
- 4.7.The company includes anti-bribery policy clauses in:
- Contracts with suppliers.
 - Contracts with third parties.
- 4.8.The company may implement inspections or audits to verify compliance with the provisions established herein.
- 4.9. Anti-bribery objectives will be defined clearly, demonstrably, and in a manner aligned with the identified risks, organizational context, and the commitments established in this policy.

5.COMMITMENT OF THE ORGANIZATION AND ITS SENIOR MANAGEMENT

5.1 Senior Management and all of the organization's personnel manifest their commitment to complying with the requirements established in the implemented Anti-Bribery Management System.

Likewise, they commit to:

- Provide annual training to personnel on anti-bribery and organizational ethics.
- Maintain clear and auditable financial records.
- Including anti-bribery clauses in contracts with suppliers and third parties.
- Implement internal controls for gifts, hospitality, donations, and sponsorships. For gifts, donations, hospitality, and sponsorships received by company employees from third parties, a maximum value of exactly one hundred dollars (\$100.00) is established, an amount that may be updated or modified by the Company when it deems appropriate.
- Conducting due diligence in relationships with third parties in accordance with GN-PR-008 Procedure for Supplier Evaluation and Due Diligence.
- Immediately reporting any suspicion of bribery to the appropriate authorities..
- Define and approving the roles and responsibilities of the Anti-Bribery Compliance Officer, ensuring that the Officer has the authority, autonomy, and independence necessary to lead the implementation, monitoring, and continuous improvement of the Anti-Bribery Management System.

6.RISK MANAGEMENT

6.1. Grupo Salud Latina S.A. manages risks related to bribery as an integral part of its Anti-Bribery Management System, in accordance with the guidelines established in the ISO 37001 standard.

6.2. To achieve this, the **GN-PR-002-F003 IMS Risk and Opportunity Assessment Matrix** tool is used, which facilitates the identification, analysis, evaluation, and treatment of risks and opportunities that may affect the achievement of system objectives. This matrix is periodically reviewed and updated, and its results are considered in the planning of preventive, corrective, and continuous improvement actions, ensuring a proactive and systematic approach to bribery prevention.

7.COMMUNICATION

7.1 The anti-bribery policy is communicated clearly and accessibly at all levels of the organization, as well as to relevant interested parties, in order to ensure its understanding, ownership, and compliance.

7.2. Grupo Salud Latina S.A communicates the Anti-Bribery Policy in the following ways:

- Published on the organization's website.
- Distribution through posters, onboarding sessions, and training.
- Sharing electronically with clients, suppliers, and interested parties.

8.SANCTIONS

8.1 Non-compliance with these provisions by company personnel will be considered a serious offence and grounds for dismissal without employer liability.

8.2.The offense will carry equal severity for the employee who engages in any of the behaviors described herein, as well as for the employee who, having witnessed such behavior, fails to report it.

9.STATEMENT FROM SENIOR MANAGEMENT

Our Anti-Bribery Policy constitutes a fundamental pillar of Grupo Salud Latina's Anti-Bribery Management System, reflecting the organization's strong commitment to ethics, transparency, and integrity in all its operations. Therefore, I, **Phillip Unger**, on behalf of Grupo Salud Latina S.A., reaffirm our institutional commitment to act with zero tolerance for bribery, to promote a culture of compliance, to prevent any form of corruption, and ensure that all employees, partners, and interested parties adhere to the principles established in this policy.