

Anti-Corruption Policy

Background

According to Transparency International, corruption is the abuse of entrusted power for private gain. Corruption includes practices such as bribery, facilitation payments, fraud, extortion, collusion, and money laundering; the offer or receipt of gifts, loans, fees, rewards, or other advantages as an inducement to do something that is dishonest, illegal, or represents a breach of trust.

Guiding Principles

Photocure has zero tolerance for corruption and bribery. We act consistent with the anti-bribery and anti-corruption laws that exist worldwide and we require the same from our business partners.

Photocure's stance against bribery and corruption is embedded in our Code of Conduct.

Our Policy

- **Strictly prohibiting bribes and all forms of illegal payments:** We strictly prohibit bribes, kickbacks, illegal payments and any other offer of items of value that may inappropriately influence or reward a customer to order, purchase or use our products. This applies whether provided directly or indirectly through a third party such as a distributor or other agent. Our internal controls at all levels of the organization ensure compliance with anti-bribery and anti-corruption laws.
- **Ensuring our interactions with public and private entities and individuals are in line with ethical and anti-bribery and anti-corruption standards:** It is our duty to follow local and international laws and ethical standards prohibiting bribery and corruption, and to avoid inappropriately influencing the decision to prescribe and buy our products. When we interact with healthcare professionals, healthcare organizations and systems, wholesalers and pharmacies, whether governmental or private, we do so in a legal and ethical manner consistent with principles, policies, laws and regulations and industry standards. Any third party who conducts business on our behalf must also comply with these requirements.
- **Clear rules for gifts and entertainment:** No Photocure employee shall offer payments, gifts or items of value to any government official, healthcare professional, customer or supplier for the purpose of obtaining or keeping a commercial advantage of any kind. In addition, we will not provide any payment or benefits to private sector employees to influence them to obtain or retain a business advantage. To keep our relationships fair, honest and objective, we avoid conflicts of interest that can occur when an employee solicits or accepts gifts, payments, loans, services or any form of compensation from suppliers, customers, competitors or others seeking to do business with us. Photocure employees must not accept any gifts or payments in exchange for special services or considerations.
- **Monitoring our performance:** An annual monitoring on our corruption risk and the outcome of it is published in our annual Environmental, Sustainability and Governance (ESG) report.

Application

This policy is applicable for the Board of Directors, the Management Team and all employees of Photocure.