ANTIBRIBERY POLICY

Virco Medical is active in the Trading and distribution of Orthopedic, Neurosurgical and Surgical Items, Sterile and Non.

Virco Medical's anti-bribery philosophy is to sensitize all its employees and partners against the phenomenon of bribery and to strengthen the commitment of the Administration, for zero tolerance to bribery, creating a framework of obligations, in order to be used as a tool to prevent, deter and fight of bribery.

In particular, the company through the Anti-Bribery Policy:

• is committed to complying with and monitoring compliance with the applicable anti-bribery legislative framework.

• seeks to raise staff awareness of corruption and bribery issues.

• aims to create an appropriate control mechanism, impact prevention measures for non-implementation, to detect and prevent bribery incidents.

• provides the framework for setting and achieving anti-bribery targets

• encourages the confidential, anonymous or non, reporting of any incident or suspicion of bribery through specific communication methods (by direct anonymous or named telephone communication with the company's Anti-Bribery Unit, or by anonymous or named mailing to the company's address to the ABCF, or via the email address: info@vircomedical.com or via the website named or anonymous) and the vigilance of employees, partners and all interested parties to identify actions related to bribery based on trust, without fear of reprisals in case of reporting or refusing to participate in suspected bribery activities.

• undertakes to implement the principle of independence of the Anti-Bribery Compliance Function (ABCF)

• undertakes to fully implement financial and non-financial controls in its internal operation

• is committed to raising awareness among all stakeholders of the consequences of non-compliance with the anti-bribery policy

The Anti-Bribery Policy is binding on all Employees, Management Members, Business Partners, Suppliers, and Subcontractors and any other third party acting on behalf of the company.