

## **ANTI-BRIBERY POLICY**

### **1. General Principles**

**EUROSETS S.r.l.**, a leading company in the biomedical sector and part of the **Gruppo Villa Maria S.p.A.**, recognizes that transparency, integrity, and fairness in the management of its activities are fundamental values and essential conditions for maintaining the trust of customers, suppliers, partners, institutions, and personnel.

The Company considers corruption, in all its forms, a serious obstacle to economic and social development, fair competition, sustainable growth, and the protection of corporate reputation.

For this reason, **EUROSETS** has adopted an **Anti-Bribery Management System** compliant with the requirements of **ISO 37001:2016**, as an operational tool to prevent, detect, and address unlawful conduct or behavior contrary to corporate ethical principles.

This **Anti-Bribery Policy** defines the guiding principles, the commitments of Top Management, and the rules of conduct that everyone is required to follow.

This document is based on the broader anti-bribery policy of the parent company **GVM S.p.A.**, which is hereby fully adopted and referenced.

### **2. Management Commitments**

EUROSETS Top Management undertakes to:

- fully comply with all applicable anti-bribery laws in Italy and in any other country where the Company operates;
- ensure that no employee, collaborator, or partner offers, promises, solicits, or accepts any undue advantage of any kind, directly or indirectly;
- promote a corporate culture founded on ethics, legality, and responsibility;
- ensure that all sensitive activities (such as procurement, contracts, consultancy, events and sponsorships, personnel selection, and relations with public administrations) are managed with transparency and traceability;
- guarantee that the Company's Anti-Bribery Management System has the necessary resources and autonomy to operate effectively.

### **3. Prevention, Control, and Reporting**

EUROSETS has appointed an **Anti-Bribery Compliance Function**, endowed with the necessary autonomy and independence, responsible for monitoring the application of the ISO 37001 Management System, carrying out control activities, and promoting awareness and training initiatives.

All EUROSETS employees, collaborators, and business partners are required to be familiar with and comply with this Policy and all related company procedures.

There is an absolute prohibition against engaging in any conduct that could, in any way, be construed as corruption or attempted corruption, either towards external parties or within the Group.

For the purposes of this Policy, **corruption** is defined as *“offering, promising, giving, accepting, or requesting an undue advantage of any value (whether financial or non-financial), directly or indirectly, and regardless of location, in violation of applicable law, as an inducement or reward for a person to act or refrain from acting in connection with the performance of that person’s duties.”*

EUROSETS encourages **good-faith reporting** of suspected misconduct or violations of laws and company policies through its **corporate whistleblowing channels**, which ensure confidentiality and protection of the reporter in accordance with **Legislative Decree No. 24/2023**.

Reports can be submitted through the following web link:

<https://www.eurosets.com/it/whistleblowing>.

### **4. Continuous Improvement**

Management is committed to periodically reviewing the Anti-Bribery Management System to ensure its effectiveness, updating, and continuous improvement, in line with principles of good governance and ethical sustainability.

**Medolla, October 6th, 2025**

**Antonio Petralia**

*Executive Vice President & CEO*