



Anti-Bribery Plan





About Our Company

Modern healthcare environment is a very challenging area that demands an experienced partner who can creatively **Think** how to successfully deliver innovative solutions in the **Health** sector using all modern **IT** advancements, while operating on time and on budget, aiming at providing the best possible outcome.

Inspired by the synthesis of key words Health, IT and Think and their combined significance to current demands, HealThink was founded to provide high class research, innovation and development services in the health and social care sector. HealThink realizes the importance of bioethics and the ethical challenges that arise relatively to healthcare and health research, offering full scale bioethics consultancy in the healthcare sector.

Policy

Our anti-bribery policy is consistent with the Greek law. It provides guidance about what constitutes a bribe and prohibits giving or receiving any excessive or improper gifts and hospitality.

Any policy breach can lead to dismissal or termination of contract or can lead to legal consequences.

Unreasonable facilitation payments are strictly prohibited, and our employees are provided with practical training and guidance on how to respond to demands for facilitation payments.

Based on the principles of our ABAC policy, we have established an Anti-Bribery Plan in order to identify potential risks.



Risk reduction measures

HealThink performs risk assessments to determine exposure to bribery and corruption. Our Legal & Corporate Affairs Director regularly reviews and updates these risk assessments to reflect changes in our risk profile.

To reduce the risk of exposure to bribery, the Company encourages:

- Use of e-mail communications with external parties.
- Legal advice when attending meetings with high-risk stakeholders.
- Use of schemes or systems that reduce in person contact when interacting with government officials.
- Transparency when it comes to financial transactions, more specifically:
 - E-invoicing
 - E-signing of contracts when possible
 - E-filing of taxes, contributions, licensing
- Taking part in open constructive dialogue to promote transparency, reduction of corruption risk and any other improvements to the business environment.
- Open communication in the case of any relevant suspicious findings or evidence of violation. The legal department facilitates reporting of concerns relating to illegal and unethical acts.



Risk reduction measures

HealThink always acts in accordance with applicable national law, as well as in compliance with the Company's Code of Conduct.

The following practices are prohibited:

- Approving any transaction or expense that is undisclosed or unrecorded in our books, project records and accounts or there is no supporting documentation to justify it.
- Authorizing or making any payment which will or might be used, fully or partially, for anything other than what is described in the supporting documentation.
- Omitting, falsifying, or disguising entries in any of our financial books and records or inducing or forcing any third party to do so on their own.
- Processing, possessing, concealing, or assisting any other person to obtain, process or conceal funds, assets, or property where there is knowledge or suspicion that they relate to unlawful actions.

We regard transactions with unusual terms or features, such as use of cash or use of shell companies or entities based in tax havens or high-risk countries, as red flags.



Risk reduction measures

Payments are made and received in the country where the third party is resident and, in the currency, agreed in the contract. We do not make or receive payments to or from unrelated third parties or countries. Any exceptions require specific written approval by the Legal & Corporate Affairs Director.

We provide further details of our transactions in response to valid requests that may occur by:

- Internal or external auditors
- Tax authorities
- Regulators
- Government officials
- Police

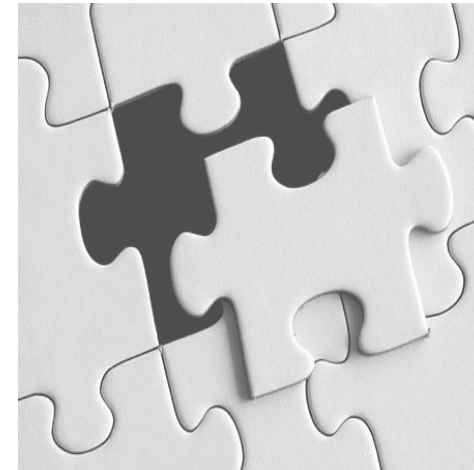


Pre-employment screening

HealThink uses employment screening prior to any contractual commitments with employment candidates. Pre-engagement screening is used to make sure our sensitive and confidential data, assets, employees, property, and quality of services are properly protected. This screening is also used to evaluate that the people we hire have:

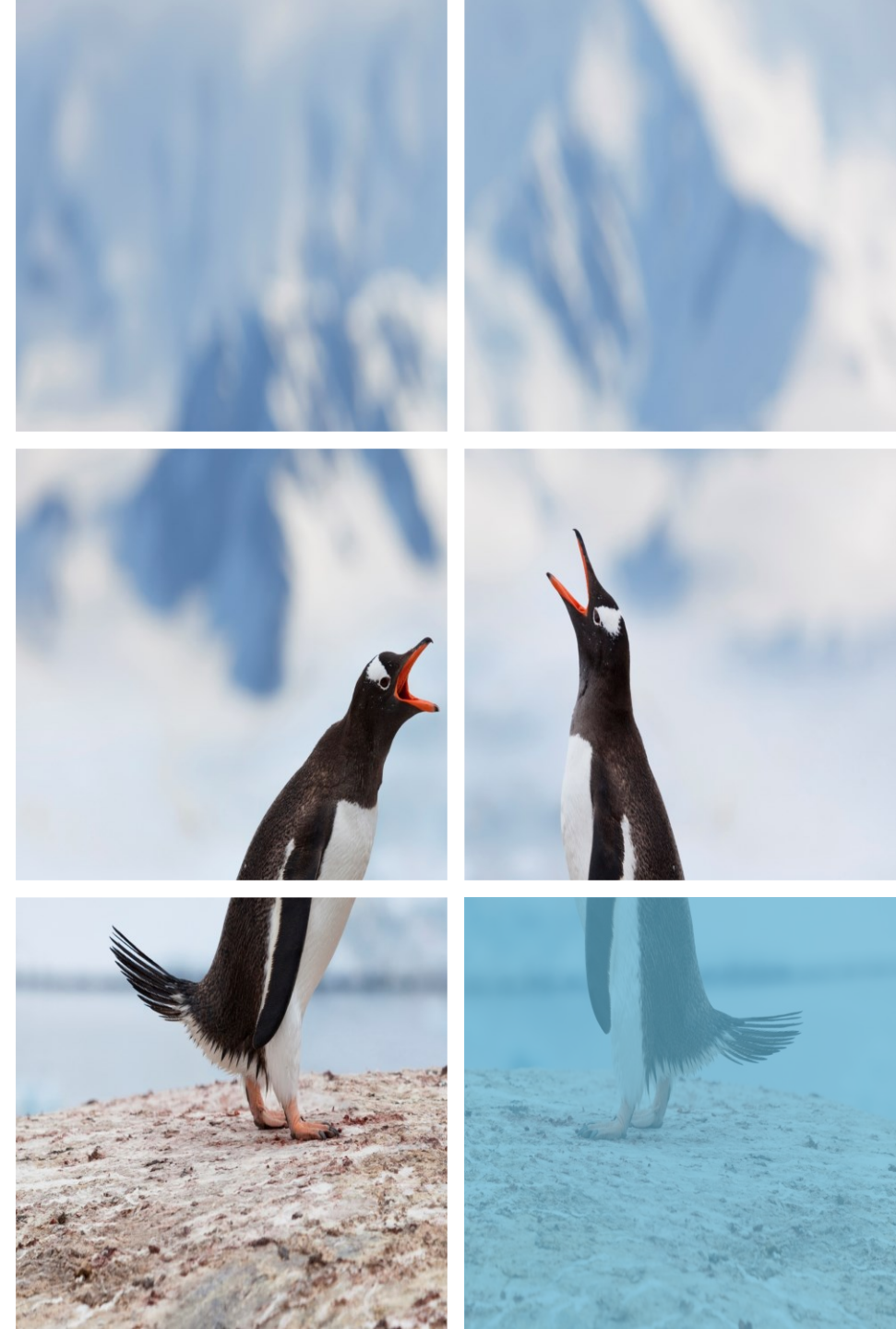
- the competences and qualifications they claim
- the experience they claim, and the background required for the positions
- the alignment with our Code of Conduct and understanding of our Company's values
- no criminal records or history of bribery and corruption

Background checks are made with transparency and after written consent by the candidates. Additional written recommendations may be requested from the candidate as per our evaluation process.



HealThink is committed to a zero-tolerance attitude to bribery and will be investing all efforts with all necessary means and budget towards this mission.


The anti-bribery plan and policy will be regularly reviewed by the Legal & Corporate Affairs Director and new measures will apply when necessary and in accordance with the Law and Code of Conduct. Any event, situation or behavior that could constitute and/or suggest a potential act of fraud or corruption will be marked as red flag and handled immediately.

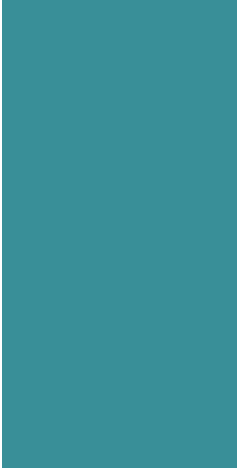




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HEALTHINK
Medical Research & Innovation

