

GLOBAL ANTI-HARASSMENT POLICY

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Version number: 1.0

Department: Global Legal Affairs Department

Written by	Reviewed by	Approved by
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Foreword

The BESINS HEALTHCARE Group is based on the Values which are at the core of its history and its business principles. One of the main Values stressed in our Code of Conduct is the Value of “Caring”, which is first and foremost implemented with our employees.

In line with the Value of Caring, BESINS HEALTHCARE is committed to providing a working environment that is free of harassment and bullying, and where everyone is treated, and treats others, with dignity and respect. BESINS HEALTHCARE will not permit or condone any form of bullying or harassment.

This policy covers bullying or harassment of or by anyone engaged to work at BESINS HEALTHCARE, Directors or officers and also by third parties such as consultants, advisors, customers or suppliers. The policy encompasses bullying or harassment that occurs in the workplace, and also out of the workplace, such as on business trips or at work-related social events.

This policy does form part of your contract of employment, and we may amend it at any time.

1. What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct or behavior (including threatening any conduct or behavior) that has the purpose or effect of violating a person’s dignity, or causing or likely to cause harassment, alarm or distress to another person, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. A single incident of this nature can amount to harassment if sufficiently serious.

Unlawful harassment may involve sexual harassment, but also includes other forms of harassment across any medium. BESINS HEALTHCARE considers that harassment is unacceptable in any form or manner, and reserves the right to deal with persons who commit harassment in such manner as it deems fit (subject always to applicable law). In the case of employees, appropriate disciplinary measures up to and including termination may be applied.

Examples of harassment may include (but are not limited to) the following:

- Display or circulation of sexually suggestive material or material with racial overtones;
- Use of slang names for racial groups, or age groups, or for disabled persons;
- Professional or social exclusion;
- Unwanted physical conduct, such as touching, pinching, pushing and grabbing;
- Unwelcome sexual advances or suggestive behaviour;

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- Threatening, abusive, or insulting language, comments or other non-verbal gestures;
- Stalking; or
- Offensive emails, text messages or social media content.

2. What is bullying?

Bullying is a sustained form of psychological abuse. It is defined as offensive, intimidating, malicious or insulting behaviour, involving the abuse or misuse of power, which has the purpose or effect of belittling, humiliating or threatening the recipient.

Workplace bullying usually takes one of three forms: physical, verbal or indirect. It can range from extreme forms such as violence and intimidation to less obvious actions, such as professional or social exclusion.

Examples of bullying may include (but are not limited to) the following:

- Shouting or swearing at people in public or private;
- Spreading malicious rumours;
- Inappropriate and/or derogatory remarks about someone's performance (which are not linked to an objective assessment of the latter);
- Physical or psychological threats;
- Constantly undervaluing effort;
- Rages, often over trivial matters;
- Ignoring or deliberately excluding people;
- Deliberately sabotaging or impeding work performance.

Please note that managers are duty-bound to give their team members feedback and to generally manage their performance. Legitimate, reasonable and constructive criticism of a team member's performance or behaviour, or reasonable instructions given to an employee in the course of their employment, will not amount to bullying on their own. Also, detailed supervision of a team member who has performance issues does not amount to bullying.

It is important to note that harassment occurs even if the harasser perceives his/her behaviour as being harmless and without malice, or 'just a bit of fun'. What matters is how the behaviour makes the recipient feel, and not what the perpetrator's intentions were. Also, a person may be harassed even if they were not the intended 'target' of the behaviour. For example, a man may be harassed by sexist jokes about women if the jokes create an environment that is offensive to him.

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3. What to do in the case of bullying or harassment?

3.1. Informal approach

Employees should always attempt first to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting, so an informal discussion may help them to understand the effects of their behaviour and agree to change it.

If you feel able to, tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately. You should keep a note of the date and what was said and done. This will be useful if the unacceptable behaviour continues and you wish to make a formal complaint.

If this is too difficult for you, then please talk to your supervisor or manager, or to the designated person (the “Harassment Referent” who will be established in every entity pursuant to this Policy) who will be able to support you and guide you through the process. They may, for example, speak to the person concerned on your behalf, or accompany you when you speak to them.

If the informal approach is not appropriate, or has not been successful, an employee may raise a formal grievance.

3.2. Formal procedure

When an employee feels that they need to deal with an issue of harassment or bullying formally, they should do so according to the BESINS HEALTHCARE’s grievance procedure as codified by the Human Resources responsible for the specific entity where the employee is working. Should there be no formal grievance procedure, then matters may be addressed to the Compliance Officer or via the Whistleblowing line implemented by the Policy on Whistleblower Protection (GLAD-POL-007), where the matter will be addressed.

We will investigate complaints in a timely, confidential and sensitive manner. The investigation will be conducted where possible by someone with appropriate seniority and experience, and no prior involvement in the complaint, and whose position is not one which may suggest bias for the purpose of handling the investigation. Details of the investigation, and the names of the people involved, will only be disclosed on a ‘need to know’ basis. While the investigation will be conducted discreetly, in the course of our investigation, where deemed appropriate and/or necessary, the person accused will be informed of their alleged misconduct and provided an opportunity to present their case. We will then consider whether any steps are necessary to manage the ongoing working relationship between you and the person accused during the investigation.

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Once the investigation is complete, we will inform both parties of our decision. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

4. Consequences of breach of this policy

If after due investigation we consider that a team member has been harassed or bullied by an employee the matter will be dealt with under the disciplinary procedure as a case of possible misconduct or gross misconduct. The person concerned may be suspended on full pay during the disciplinary investigation until any eventual disciplinary proceedings have been concluded and depending on local legislation. If the complaint of bullying or harassment is upheld, a disciplinary penalty may be imposed up to and including dismissal, depending on the seriousness of the offence and all relevant circumstances and within the respect of local legislation.

Where it is found that an employee has been harassed by a third party, such as a consultant, advisor, customer, supplier or independent contractor, BESINS HEALTHCARE will take such steps as are reasonably practicable to prevent any recurrence.

If someone makes a complaint which is not upheld, and the Company has good grounds for believing that the complaint was not made in good faith, BESINS HEALTHCARE will take disciplinary action against the person making the false complaint.

5. Protection and support for those involved

Team members who make complaints in good faith, or who participate in any investigation must not suffer any form of retaliation or victimisation as a result as per our Whistleblower Protection Policy. Any employee engaged in retaliation will be subject to disciplinary action.

6. Record-keeping

While the process may vary from case to case, investigations undertaken by BESINS HEALTHCARE should be done in accordance with the following steps:

- Upon receipt of complaint, the Harassment Referent will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If the complaint is verbal, they will encourage the individual to complete a complaint in writing. If he or she refuses, they should prepare a complaint “on behalf” based on the verbal reporting which will be then conducted

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by an officer designated in each entity for the investigation (“Investigating Officer”), which may be the local or Global Human Resources officer. The Investigating Officer will then decide on further steps in the investigation among others:

- If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses;
- Create a written documentation of the investigation (such as a letter, memo or email), which contains the following:
 - A list of all documents reviewed, along with a detailed summary of relevant documents;
 - A list of names of those interviewed, along with a detailed summary of their statements;
 - A timeline of events;
 - A summary of prior relevant incidents, reported or unreported; and
- The disciplinary instance where the violation will be decided
- The basis for the decision and final resolution of the complaint, together with any corrective action(s).
- Keep the written documentation and associated documents in a secure and confidential location.

Should the plaintiff have grounds to believe that the Investigating Officer not be in a position to carry out an objective investigation on the matters involved for any reason, it may request the Compliance Committee to designate another Investigating Officer, based on a motivated request in writing. The Compliance Committee may then ask the advice of a Harassment Referent or any other person it considers relevant in this matter, with regard to the request and will take its decision based on a fair and objective assessment of the situation.

A complete record of the hearing, including all evidence, testimonies, and the final decision, shall be maintained by the Compliance Officer. These records shall be kept confidential and only accessible to authorized personnel. The records shall be kept for a period of one(1) year if a violation is found not to be substantiated and a maximum period of seven (7) years or until the departure of the said employee, whichever being the longest. In the absence of any repeated violations during a minimum period of two (2) years, an employee may request the records to be stricken off earlier, to

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the discretion of the Committee. These will be processed in accordance with our Data Protection policy.

7. How we can all help to stop bullying and harassment

We all have a shared responsibility to help create and maintain a working environment free of bullying and harassment. You can do this by:

- Considering how your own behaviour may affect others, and changing it;
- Being receptive, rather than defensive, if asked to change your behaviour;
- Treating your colleagues with dignity and respect;
- Taking a stand if you think inappropriate jokes or comments are being made;
- Making it clear to others when you find their behaviour unacceptable;
- Intervening, if possible, to stop harassment or bullying, and giving support to victims;
- Reporting harassment or bullying to your manager or another appropriate officer of BESINS HEALTHCARE;
- Being open, honest and objective in any investigation of complaints.

Supervisors and Managers have a particular responsibility to:

- Set a good example by their own behaviour;
- Ensure that there is a supportive working environment in their team;
- Communicate to team members what standards of behaviour are expected from them;
- Intervene to stop bullying or harassment;
- Report promptly to HR or senior management any complaint of bullying or harassment.
- Avoid any retaliatory behaviour against any person who has a good faith belief that the practices reported were unlawful under this Policy or the law.

8. Supervisory Responsibilities

All supervisors and managers who receive a complaint or information about suspected harassment, observe what may be harassing behavior, bullying or for any reason suspect that harassment or bullying is occurring, are required to report such suspected harassment to the Harassment Referent and/or Human Resources.

In addition to being subject to discipline if they engaged in harassing or bullying conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected harassment or bullying or otherwise knowingly allowing harassment or bullying to continue.

Supervisors and managers will also be subject to discipline for engaging in any retaliation against any person acting in good faith and reporting, witnessing, or otherwise participating to an investigation on matters of harassment or bullying.

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9. Implementation

The BESINS HEALTHCARE Group adopted this policy as of 24 July 2025. It is applicable with immediate effect to all Corporate entities of the Group, except where a local policy has been adopted which is stricter than this Policy.

All regional entities of the BESINS HEALTHCARE Group are obliged to either translate and adopt directly this policy or adapt it to stricter standards according to local legislation by September 30th, 2025 (“Latest Implementation Date”). All regional entities and Corporate entities are obliged as of the date of this Policy to designate Harassment Referents in the company and advise the Compliance Committee and Global Human Resources of the identity of these Harassment Referents. After the Latest Implementation Date, this Policy shall become directly applicable to any entity which did not adopt it and Global Human Resources will be entitled to designate local Harassment Referents in each entity which will not have done so already.

This policy will be reviewed annually by the Compliance Committee after advice from the Compliance Officer and Global Human Resources.

A yearly report on signaling of harassment or bullying will be delivered by the Compliance Committee to the CEOs with its advice on any corrective actions and/or amendments required to processes.

Signed by:
Nicolas Besins

 Signer Name: Nicolas Besins
 Signing Reason: I approve this document
 Signing Time: 21 July 2025 | 4:07:29 PM CEST
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Nicolas Besins

CEO

Signed by:
Alexandre Besins

 Signer Name: Alexandre Besins
 Signing Reason: I approve this document
 Signing Time: 21 July 2025 | 4:30:50 PM CEST
 27805063219341429B04B281A7ABE547

Alexandre Besins

CEO