

ANTICORRUPTION POLICY

Effective as of June 15th, 2026



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1. PURPOSE

The purpose of this Anti-Corruption Policy is to ensure that all Cooper Consumer Health (CCH) Group activities are conducted with integrity, transparency, and in full compliance with applicable anti-corruption laws and regulations.

Corruption and influence peddling undermine trust, distort fair competition, and expose the company and individuals to significant legal, financial, and reputational risks. They are strictly prohibited within all the companies of the CCH Group.

This Policy provides the principles and rules that must guide employees and business partners in preventing corruption in all business relationships. It complements the CCH Code of Conduct by providing practical guidance on situations that may expose the Group to corruption risks, such as gifts and hospitality, conflicts of interest, interactions with third parties, or financial transactions.

The objective of this Policy is not to anticipate every possible situation, but to provide clear principles to help employees make the right decisions in their daily activities.

When in doubt, employees are expected to seek guidance from their manager or the Legal & Compliance Team.

2. SCOPE

This Policy applies to all CCH entities and covers all activities of the Group in all countries where it operates.

It applies to:

- all employees, officers, and directors of all the CCH entities
- anyone acting on behalf of a CCH entity, including consultants, agents, distributors, suppliers, and other business partners where relevant.

All individuals covered by this Policy are expected to comply with its principles, regardless of local customs or business practices.

Where local laws or regulations impose stricter rules than those set out in this Policy, the stricter rules must be applied.

3. CORE PRINCIPLES

CCH conducts its activities according to the following principles:

- Integrity in all business relationships
- Compliance with applicable laws and regulations
- Transparency in financial and commercial transactions
- Accountability when interacting with business partners and public authorities.

4. PROHIBITION OF CORRUPTION AND INFLUENCE PEDDLING

4.1. Definitions

Corruption occurs when a person offers, promises, gives, requests, or accepts an undue advantage in order to influence a decision, action, or behavior in breach of legal, professional, or contractual obligations.

An undue advantage may take many forms, including money, gifts, hospitality, services, employment opportunities, preferential treatment, or any other benefit.

Corruption may be:

- active, when a person offers or promises an advantage
- passive, when a person requests or accepts such an advantage.

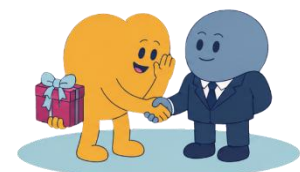
It may occur directly or indirectly, including through intermediaries or third parties, or by granting advantages to relatives or associates of the intended beneficiary.

Corruption can involve both public officials and private individuals or organizations.



A **public official** is any person who holds a public office, exercises a public function, provides a public service, or acts on behalf of a public authority or public organization. This includes, for example, government officials, employees of public administrations, representatives of regulatory authorities, customs officers, and employees of state-owned or state-controlled entities.

Facilitation Payments are small, unofficial payments made to a public official in order to expedite or secure the performance of a routine administrative action, such as issuing permits, licenses, or customs clearances. Although such payments may be considered customary in certain countries, they are prohibited under many anti-corruption laws and are inconsistent with the company's integrity standards.



Influence peddling refers to a situation where a person abuses or claims to use their real or supposed influence over a decision-maker in exchange for an advantage.

For the purpose of this Policy, the term corruption includes both bribery and influence peddling.

4.2. Rules and Principles

CCH strictly prohibits all forms of corruption and influence peddling. Facilitation payments are also strictly prohibited.

Employees and anyone acting on behalf of any entity of CCH Group must never:

- offer, promise, give, request, or accept any undue advantage
- directly or indirectly influence a decision in exchange for a benefit

- use intermediaries, consultants, distributors, or other third parties to carry out actions that would be prohibited if performed directly
- engage with public officials for non-legitimate or non-transparent purposes
- make, offer, or authorize any payment intended to obtain or accelerate an administrative action that should normally be performed without such payment. An exception may apply only where a payment is necessary to protect the health, safety, or physical integrity of an employee or another person. In such cases, the situation must be reported as soon as possible through the appropriate internal channels and properly documented.

All business decisions must be based solely on legitimate, objective, and transparent considerations such as quality, price, performance, and the best interests of the company.

No employee may grant or receive any advantage intended to obtain or retain business or secure an improper benefit.

5. KEY RISK AREAS

Certain business situations may present increased corruption risks and therefore require particular attention. To ensure that these situations are managed with integrity, transparency, and in compliance with applicable laws, CCH has established specific internal guidelines and procedures in the following areas:

5.1. Gifts, Hospitality and Entertainment

Exchanges of gifts or hospitality may occur in the context of legitimate professional relationships but may also create risks of undue influence if they are excessive, inappropriate, or offered in connection with a business decision. These situations are governed by the *Gifts, Hospitality & Entertainment Guideline*.

5.2. Conflicts of Interest

Conflicts of interest may arise when personal interests interfere, or appear to interfere, with the interests of any entity of CCH Group. Employees are expected to identify, disclose, and appropriately manage such situations in accordance with the *Conflicts of Interest Guideline*.

5.3. Interactions with Healthcare Professionals

In the healthcare sector, interactions with healthcare professionals are common and often necessary for scientific exchange, education, or research activities. Because such interactions may present risks of undue influence, they must be conducted in accordance with the *Interactions with Healthcare Professionals Guideline*.

5.4. Relationships with Business Partners

Entities of CCH Group may engage distributors, agents, consultants, suppliers, or other intermediaries in connection with its activities. Appropriate due diligence and oversight must be applied when selecting and working with such partners, as described in the *Third-Party Due Diligence Procedure*.

5.5. Donations, Sponsorships and Charitable Contributions

Donations, sponsorships, and charitable contributions must pursue legitimate purposes and must not be used to obtain an improper advantage or influence a decision. These activities are governed by the *Donations, Sponsorship and Charitable Contributions Guideline*.

Employees must ensure that they are familiar with and comply with the guidelines and procedures applicable to these situations. When in doubt about how to manage a situation that may involve corruption risks, employees should seek guidance from their manager or the Legal & Compliance team before proceeding.

6. INTERACTIONS WITH PUBLIC AUTHORITIES AND LOBBYING

6.1. Relations with Public Authorities

Interactions with public authorities may occur in a variety of legitimate contexts, including regulatory procedures, inspections, public consultations, or participation in public policy discussions.

Because such interactions may create heightened corruption risks, they must always be conducted with integrity, transparency, and professionalism.

Employees must ensure that any communication or engagement with public authorities serves a legitimate purpose and complies with applicable laws, regulations, and internal procedures.

Employees must not attempt to improperly influence public officials, whether directly or indirectly, including through gifts, hospitality, donations, or the use of intermediaries.

6.2. Lobbying Activities

Lobbying refers to activities intended to contribute to the development or modification of public policies, legislation, or regulations by communicating information, expertise, or positions to public authorities.

Such activities may only be carried out on behalf of entities of CCH Group by authorized employees or representatives and in compliance with applicable laws and transparency requirements.

When in doubt about the appropriate way to interact with public authorities or participate in lobbying activities, employees should seek guidance from their manager or the Legal & Compliance team before proceeding.

7. EXPECTATIONS WHEN CONDUCTING BUSINESS

All employees and individuals acting on behalf of any entity of CCH Group are expected to conduct business with integrity, transparency, and professionalism.

Business decisions must always be based on legitimate and objective considerations such as quality, performance, price, and the best interests of CCH. Employees must ensure that their actions are consistent with applicable laws, the company's values, and the principles set out in this Policy.

In particular, employees are expected to ensure that:

- Business relationships are established for legitimate purposes and conducted in a transparent manner.
- Payments and other financial transactions correspond to legitimate services or goods that have actually been provided.
- Compensation paid to third parties is proportionate to the services performed and consistent with market practices.
- Transactions are properly documented and accurately recorded in the company's books and records.
- Third parties acting on behalf of any entity of CCH Group are engaged and managed in accordance with the company's integrity standards and applicable internal procedures.

Employees must remain attentive to situations that may present corruption risks and exercise sound judgment when conducting business activities.

When in doubt about the appropriateness of a situation or a proposed course of action, employees should seek guidance from their manager or the Legal & Compliance team before proceeding.

8. RAISING CONCERNS AND SEEKING GUIDANCE

Employees may encounter situations where the appropriate course of action is not immediately clear or where a concern about potential misconduct may arise.

In such cases, employees are expected to seek guidance and raise concerns so that issues can be addressed promptly and appropriately. Asking questions and reporting concerns are essential elements of maintaining a culture of integrity and preventing misconduct.

Employees are encouraged to discuss any questions or concerns with their line manager or with the relevant internal functions, including their manager, Human Resources or Legal & Compliance.

Concerns about potential violations of this Policy or applicable laws may also be reported through CCH's protected reporting system, which allows individuals to raise concerns in a secure and confidential manner: <https://cooperconsumerhealth.integrityline.com/>.