



CODE OF CONDUCT

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Code of Conduct for Preventing and Contending Harassment at Work

The purpose of this Code of Conduct is to increase awareness and understanding among all the human resources of Promptly to prevention and management of problems of harassment at work, providing a guiding framework for action that enables the identification of circumstances in compliance with the provisions of Article 127, nr.1) k) of the Portuguese Labour Code.

A. General principles of conduct

Promptly employees, whether internally or on external representation, must act in accordance with the ethical principles and values associated with Promptly, adopting behaviour based on responsibility, rigour and strict respect for people's dignity and rights.

Promptly encourages respect and co-operation between all employees, in a respectful and dignified working environment, and therefore no harassment practices are tolerated or acceptable.

Valuing people and relationships is one of Promptly's values. Abusive behaviour that could be interpreted as bullying, sexual harassment or any abuse of power is not tolerated.

Everyone must be treated with respect and dignity. Physical or verbal behaviour that humiliates others, interferes with performance or creates an intimidating, abusive, hostile or offensive working environment is not acceptable.

Each employee must fully understand the content of this Code of Conduct and apply it in its entirety.

B. Who this Code of Conduct applies to

This Code of Conduct applies to all Promptly employees, meaning members of the governing bodies, managers, service providers, permanent external consultants and all those who have entered into a dependent labour contract or a service contract with Promptly, and to all third parties who formally undertake to comply with and observe this Code of Conduct.

The application of this Code of Conduct and its observance does not prevent or replace the application of other codes and manuals of any kind relating to

specific standards of conduct for the exercise of certain functions, activities and/or professional groups.

C. Rules of behaviour

1. Harassment of any kind is prohibited.

2. Harassment is defined as unwanted behaviour, that based on discrimination, practised when accessing employment or in employment, work or vocational training, with the aim or effect of disturbing or embarrassing a person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.

3. Harassment is an expression of undesirable and/or unacceptable behaviour on the part of one or more individuals, perceived as a practice of persecution or mistreatment, namely because of ancestry, gender, nationality, genetic heritage, language, territory of origin, religion, political or ideological beliefs, trade union membership, education, economic situation, social status, sexual orientation, disability, illness and reduced working capacity and can take various forms, some of which are more easily identifiable than others.

4. Harassment at work includes behaviour that, when analysed in isolation, may not be considered illegal, but when taken as a whole, can create discomfort and unease in the workers that hurts their professional dignity, moral and psychological integrity, to such an extent that it can have repercussions on work performance and the workers' own health.

5. Sexual harassment is unwanted behaviour of a sexual nature, in verbal, non-verbal or physical form, with the aim or effect of disturbing or embarrassing a person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.

6. Workers must refrain from any form of discrimination or harassment, including, but not limited to, on the grounds of race, gender, age, physical ability, sexual orientation, political opinions, religion, ideological beliefs and trade union membership.

7. Whenever possible, and in accordance with criteria of reasonableness and prudence, workers must prevent or stop acts of harassment or abusive pressure of which they have direct knowledge, namely by notifying their hierarchical superior.

8. The Complainant of harassment and the witnesses indicated by them may not be disciplined (unless they do so knowing the allegation to be false and

with the sole intention of harming the Complainant and/or the Company), nor in any way be harmed in their status or exercise of labour or civil rights.

9. The employer will ensure the anonymity of whistleblowers and witnesses, when justified.

10. Harassment is a very serious offence, without prejudice to any criminal liability provided for under the law.

11. The employer must initiate disciplinary proceedings whenever it becomes aware of alleged harassment at work.

D. Application

If in doubt about the interpretation of any of the above-mentioned rules, employees should consult Promptly's Team Success department.

If the employee wants to claim issues related to irregularities or misbehaviour regarding Promptly's Code of Conduct, this [Reporting Form](#) should be filled in. All claims will be sent to Team Success department's email address: teamsuccess@promptlyhealth.com. Team Success department will respond appropriately and as fast as possible to ascertain the claim in question to define which measure should be adopted to minimize possible damages and to assure that same situation will not happen in the future.

E. Disclosure

Promptly's Management will promote the appropriate dissemination of this Code of Conduct to all employees, in order to consolidate the application of the principles and the adoption of the behaviours set out in it.

F. Responsibilities

Promptly's employees are also individually responsible for complying with the obligations set out in this Code of Conduct and current legislation. Employees' behaviour must be always guided by the principles and values contained herein. Failure to comply with this Code of Conduct could result in financial and reputational loss for Promptly, the application of criminal or civil sanctions, or liability not only for Promptly, but also for the employees in question.

Anti-Bribery Policy

1. Purpose

This Anti-Bribery Policy (the “Policy”) sets out our commitment to conducting business ethically and in compliance with all applicable anti-bribery and anti-corruption laws, including the French Sapin II Law, UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act (FCPA). The purpose of this Policy is to prevent bribery and corruption in any form, both within the organization and in our dealings with third parties.

2. Scope

This Policy applies to all employees, officers, directors, contractors, consultants, agents, and any other third party acting on behalf of Promptly, regardless of location or role.

3. Definition of Bribery

Bribery involves offering, giving, receiving, or soliciting anything of value—such as money, gifts, hospitality, favors, or services—to influence the actions or decisions of an individual in a position of power or trust.

4. Prohibited Conduct

The following are strictly prohibited:

- Offering, promising, or giving a bribe.
- Requesting, agreeing to receive, or accepting a bribe.
- Making facilitation payments (i.e., small unofficial payments to speed up routine actions).
- Using third parties (such as agents, consultants, or intermediaries) to engage in bribery.
- Offering or accepting lavish gifts, entertainment, or hospitality intended to improperly influence a decision.

5. Gifts and Hospitality

Gifts and hospitality must never be offered or accepted if they:

- Are intended to improperly influence a business decision.

- Are excessive, inappropriate, or lack transparency.
- Violate local laws or customary practices.

6. Political and Charitable Contributions

Promptly does not permit political donations intended to gain commercial advantage. Charitable contributions must be vetted to ensure they are not used as a means of bribery or corruption and must be fully documented.

7. Conflicts of Interest

Employees must avoid situations where their own personal interests conflict with Promptly's interests. Potential conflicts must be disclosed to management for appropriate handling.

8. Reporting Concerns

Employees who suspect or become aware of potential bribery or corruption situations must report it immediately to their manager, Human Resources, or via Promptly's whistleblower hotline or reporting system. Reports will be investigated confidentially with protections against retaliation.

9. Compliance and Consequences

Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment, and may also expose individuals to criminal prosecution.

10. Training and Review

Promptly will provide training for relevant employees and third parties to ensure understanding and compliance with this Policy. This Policy will be reviewed and updated periodically.

PROMPTLY SOFTWARE SOLUTIONS FOR HEALTH MEASURES, S.A.

Trofa, 20 December 2024