PENAL COMPLIANCE POLICY

1. DIAGNOSTICA LONGWOOD S.L.U.´S CRIMINAL COMPLIANCE POLICY

DIAGNOSTICA LONGWOOD S.L.U. conducts its business and operations in compliance with all relevant laws and regulations and implements internal guidelines, policies and procedures to ensure that such laws and regulations continue to be complied with.

DIAGNOSTICA LONGWOOD S.L.U. identifies, manages and communicates to the Governing Body and management the risk of criminal non-compliance that must be prevented.

Inappropriate behaviour by a single officer, employee or staff member performing functions for **DIAGNOSTICA LONGWOOD S.L.U**. can potentially damage our image and reputation in a very short space of time. We must therefore actively prevent and avoid this possibility. To this end, all members of **DIAGNOSTICA LONGWOOD S.L.U**., whether shareholders, directors, officers or employees ("Personnel"), are required to conduct our business with a firm commitment to comply with applicable laws and regulations, our ethical principles, our Compliance Manual and internal policies, and the procedures and controls established within **DIAGNOSTICA LONGWOOD S.L.U**.

The purpose of this Policy is to send a strong message of opposition to the commission of any unlawful act, criminal or otherwise, to the staff of **DIAGNOSTICA LONGWOOD S.L.U**, as well as to third parties who deal with **DIAGNOSTICA LONGWOOD S.L.U**.

Under no circumstances is the commission of a criminal offence by staff justified (and prohibited), even if such action would appear to be of any benefit whatsoever to **DIAGNOSTICA LONGWOOD S.L.U**. is also prepared to combat such acts and to prevent any damage to its image and reputational value.

This Compliance Policy is the framework for **DIAGNOSTICA LONGWOOD S.L.U**.'s existing Compliance Model, which is known to all staff and promoted by the Governing Body.

The scope covers those activities within **DIAGNOSTICA LONGWOOD S.L.U**.'s processes and the people who carry them out.

2. WHY A COMPLIANCE MANAGEMENT SYSTEM?

The main reasons for implementing an effective and efficient Compliance Management System are highlighted below:

1. Strong business ethics culture: guidance on appropriate and correct behaviour for management and employees.

2. Liability and fines: to avoid criminal/civil liabilities and the imposition of penalties and fines on **DIAGNOSTICA LONGWOOD S.L.U**.

3. Legal claims: to avoid third party claims against **DIAGNOSTICA LONGWOOD S.L.U**.

4. Reputational risk: to avoid damage to the reputation of **DIAGNOSTICA LONGWOOD S.L.U**. by ensuring its value.

5. Customers: to maintain and secure business with major customers who require that their suppliers' activities comply with all applicable laws and regulations.

6. Supply chain management: to ensure supply chain risk reduction by ensuring responsible and ethical business practices are applied in global supply chains.

A Compliance Management System therefore contributes to securing and enhancing the value of **DIAGNOSTICA LONGWOOD S.L.U**. and protecting management against personal liability.

3. CRIMINAL COMPLIANCE MANAGEMENT SYSTEM

DIAGNOSTICA LONGWOOD S.L.U. has a Compliance Management System that meets the minimum requirements set out throughout this document and is consistent with the organisation's purpose.

In order to establish an effective Management System, **DIAGNOSTICA LONGWOOD S.L.U**. takes into account the following steps:

- Identifies and assesses risks;

- Develop preventive measures;

- Implements;

- Detect, respond and track effectiveness;

- Reports; and

- Continuous improvement of its Management System.

Criminal Compliance is the result of **DIAGNOSTICA LONGWOOD S.L.U**. meeting its criminal compliance objectives through compliance with the requirements set out below:

a) Commitment

DIAGNOSTICA LONGWOOD S.L.U. Management is responsible for developing and implementing a Compliance Management System based on the application of appropriate policies and procedures that ensure compliance with all applicable laws and regulations.

The appointment of a compliance officer does not relieve management of its ultimate responsibility for establishing an effective Criminal Compliance System.

DIAGNOSTICA LONGWOOD S.L.U. Management communicates its clear commitment to criminal compliance ("the higher the hierarchy, the higher the standards") and complies with the requirements of this Criminal Compliance Policy and the implemented Criminal Compliance Management System.

DIAGNOSTICA LONGWOOD S.L.U. is committed to the continuous improvement of the Criminal Compliance Management System.

b) Compliance Officer

A senior person has been appointed to act as "Compliance Officer".

The Governing Body has appointed a Compliance Officer, who has a legal and economic understanding of compliance issues; he is reliable and trustworthy.

The responsibilities and tasks delegated to the Compliance Officer are well defined and documented, which is done through a letter of appointment from the Governing Body addressed to and countersigned by the Compliance Officer.

The Criminal Compliance Officer has sufficient resources to fulfil his or her duties adequately.

The Criminal Compliance Officer works together with the company's management and has full collaboration with the other bodies of the organisation.

c) Risk identification/assessment

The Criminal Compliance Management System is based on a documented process in which criminal compliance risks are identified and assessed. The identification and assessment of risks is repeated at fixed intervals or in specific response to an extraordinary event, significant change in the structure or activity of **DIAGNOSTICA LONGWOOD S.L.U**., changes in case law or relevant legislative changes.

d) Development of corrective measures

Once the risk identification and assessment process has been completed, measures are developed to eliminate the cause of the non-conformity and prevent recurrence.

DIAGNOSTICA LONGWOOD S.L.U. develops or, as appropriate, revises existing compliance documents (taking into account the results of the risk identification and assessment).

e) Training

Employees receive basic compliance training and their attendance at such training is documented.

The contribution of the company's staff to the effectiveness of the Criminal Compliance Management System is essential for them to help prevent and detect criminal risks, avoiding their materialisation and recognising risk factors.

f) Competition

DIAGNOSTICA LONGWOOD S.L.U. ensures the competence of compliance staff, based on appropriate education, training or experience.

Performance targets are regularly reviewed to ensure that reasonable safeguards are in place to prevent them from incentivising criminal risk-taking or promoting inappropriate behaviour in relation to criminal compliance.

g) Internal information channel

DIAGNOSTICA LONGWOOD S.L.U. has implemented an effective whistleblowing system whereby employees and third parties can report any information regarding alleged non-compliance.

If necessary, employees filing a complaint may do so anonymously, unless the law does not allow it at the following link:

http://centinela.lefebvre.es/public/concept/1846474?access=ReKB69DLi3LFqcAzi5lrwknWT86zBpL97xsw8XlOp7w%3d

h) Sanctions for misbehaviour

Non-compliance requires an appropriate sanction regardless of the status of the employee concerned (including, for example, non-payment of bonuses, legal action or dismissal).

i) Procedures for the delegation of powers

Where **DIAGNOSTICA LONGWOOD S.L.U**. management delegates decision-making in areas where there is a higher than low criminal risk, **DIAGNOSTICA LONGWOOD S.L.U**. will establish and implement a procedure and system of controls to ensure that the decision-making process and the level of authority of decision-makers are appropriate and free from actual or potential conflicts of interest.

j) Target

The objective of this policy is to state the commitment of the organisation and in particular of its governing bodies and senior management to the compliance function.

Criminal Compliance objectives are consistent with the provisions of this Policy and the results of the criminal risk identification and assessment, are monitored according to the established schedule once the criminal risk assessment process has been conducted, communicated, measurable (if possible) and updated as appropriate.

The Governing Body promotes and approves this criminal compliance policy which:

- Requires compliance with the criminal law applicable to the organisation.
- Is congruent with the organisation's aims

- Prohibits the commission of criminal acts
- Minimises the organisation's exposure to criminal risks
- It provides a suitable framework for defining, reviewing and achieving criminal compliance objectives.

Approved by:

*Miguel Giralt Herrero. CEO of **DIAGNOSTICA LONGWOOD S.L.U**.*

Date: 15/10/2025