

	Publication	PL 16/01
	Anti-Bribery Policy	Effective date: 6/04/2026

Introduction

Epidata, a company providing custom Software Design, Development and Maintenance services and software quality assurance, commits to carrying out its activities with **integrity, transparency, ethics and compliance**, expressly rejecting any form of personal benefit or bribery, direct or indirect, in all its operations and relationships with third parties. It likewise commits to establishing, implementing, maintaining, and continuously improving an Anti-Bribery Management System in accordance with ISO 37001, based on risk assessment and the application of proportionate controls aimed at preventing, detecting, managing, and eradicating bribery risks.

Epidata acknowledges that bribery constitutes an illegal practice contrary to its values, which may generate serious legal, economic, and reputational consequences.

This Anti-Bribery Policy sets out the principles and guidelines that must guide the conduct of all persons acting on behalf of or for the benefit of Epidata, with the objective of preventing, detecting, and rejecting any conduct related to bribery.

Purpose and Scope

The purpose of this Policy is to **prohibit and prevent bribery in all its forms**, both in the public sector and in the private sector.

This Policy applies to:

- all Epidata personnel, regardless of their type of employment contract and place of work,
- management levels and members of Senior Management;
- third parties acting on behalf of, representing, or for the benefit of Epidata, including agents, consultants, intermediaries, suppliers, and business partners.

Definitions (Reference: ISO 37001:2025 Standard)

Bribery

Bribery is understood as the offer, promise, giving, acceptance, or solicitation of an undue advantage of any value (which may be of a financial or non-financial nature), directly or indirectly, and regardless of location, in violation of applicable law, as an incentive or reward for a person to act or refrain from acting in connection with the performance of that person's duties.

Note: The above is a generic definition. The meaning of the term "bribery" is that defined by the anti-bribery laws applicable to Epidata in all countries where it operates, and by its own Anti-Bribery Management System.

Facilitation payments

This is the term given, at times, to an illegal or unofficial payment made in exchange for services that the payer is legally authorized to receive, without the need to make such a

	Publication	PL 16/01
	Anti-Bribery Policy	Effective date: 6/04/2026

payment. It is normally a relatively small payment made to a low-level public official or a person with a certification function in order to secure or speed up the course of a routine or necessary procedure or action, such as the issuance of a visa, work permit, customs clearance, or installation of services. Although facilitation payments are often considered to be of a different nature from, for example, a bribe paid to obtain business, they are generally illegal, and are treated as bribes for the purposes of this document and are therefore prohibited.

Extortion payment

This occurs when money is forcibly extracted from personnel through real or perceived threats against their health, safety, or liberty, and it falls outside the scope of this document. A person's safety and liberty are of paramount importance and many legal systems do not penalize someone who reasonably fears for their own health, safety or liberty, or that of another person, from making a payment. Therefore, Epidata exceptionally permits a payment by personnel in circumstances where they fear imminent danger to their own health, safety or liberty or that of another person.

Conflict of interest

A situation in which a stakeholder has a personal interest or an organizational interest, directly or indirectly, that may compromise or interfere with the ability to act impartially in the performance of their functions in the best interest of the organization.

Notes:

- There may be different types of personal interests: commercial, financial, family, professional, religious, or political.
- Organizational interest relates to the interests of an organization or part of an organization (e.g., team or department) rather than those of an individual.

General Principles

Epidata adopts a policy of **zero tolerance towards bribery**.

No commercial objective, external pressure, local custom, or market practice justifies the commission of acts of bribery.

Bribery is prohibited regardless of:

- its amount or frequency;
- the form in which it is granted;
- the identity of the recipient;
- whether it is carried out directly or indirectly;
- whether the benefit is materialized or not.

	Publication	PL 16/01
	Anti-Bribery Policy	Effective date: 6/04/2026

Prohibition of bribery

It is strictly prohibited to offer, promise, give, solicit, or accept bribes in connection with government officials, directly or indirectly, with the purpose of obtaining or retaining business, permits, regulatory advantages, or any other undue benefit.

This prohibition includes any attempt to improperly influence decisions, acts, or omissions, delays, or abstentions in the exercise of a public function. Bribery in the private sector is equally unacceptable and is prohibited.

Epidata does not tolerate the offering or acceptance of undue advantages between private parties with the purpose of influencing commercial or contractual decisions.

Prohibition of facilitation payments

Facilitation payments are generally defined as small payments made with the purpose of securing or speeding up the action of a low-level official in a routine or necessary measure to which the person making the payment has a legal or other right.

Epidata expressly prohibits facilitation payments.

Such payments constitute a form of bribery and are not permitted, even when they are customary or culturally accepted in certain jurisdictions.

Prohibition of providing gifts, meals, entertainment, and travel

All Epidata personnel are prohibited from soliciting or accepting for themselves, their family, or close associates any type of gift, donation, gratuity, or benefit from suppliers, clients, or third parties.

However, **courtesy gifts or customary business courtesies** may be permitted, provided that:

- they do not consist of cash or cash equivalents;
- they are occasional, reasonable, and proportionate in nature;
- they do not influence, nor can they be perceived as influencing, commercial decisions.

For practical purposes, a maximum reference value is established of: USD 50.

Gifts exceeding this value must be **reported and must have prior approval from the area manager**, who will assess their reasonableness and compliance with this policy.

In the case of **promotional material or merchandising**, such as stickers, T-shirts, or higher-value items, received from clients, suppliers, or business partners, employees must **deliver them to the Human Capital area**, which will determine their institutional destination (e.g., internal draws), avoiding personal appropriation.

In all cases, it is prohibited to offer, promise, deliver, or accept gifts that may generate an undue benefit or compromise independence of judgment.

	Publication	PL 16/01
	Anti-Bribery Policy	Effective date: 6/04/2026

In case of any doubt, the area manager or the Anti-Bribery Compliance Function should be consulted.

Prohibition of bribery through third parties

Epidata may be considered responsible for acts of bribery committed by third parties acting on its behalf or for its benefit.

Therefore, the following are prohibited:

- authorizing, tolerating, or ignoring bribery conduct carried out by third parties;
- using intermediaries to carry out acts that would be prohibited if performed directly.

Anti-Bribery Compliance Function

Epidata has designated an Anti-Bribery Compliance Function, responsible for supervising the implementation and operation of the Anti-Bribery Management System.

This function has the authority, independence, and direct access to Senior Management necessary to perform its responsibilities, including advising personnel, receiving reports of possible irregularities, and supervising the management of bribery risks.

Personnel obligations

All Epidata personnel must:

- comply and act in accordance with this Anti-Bribery Policy and the controls established in the Anti-Bribery Management System;
- reject any request, offer, or attempt of bribery, direct or indirect;
- refrain from offering, promising, authorizing, soliciting, or accepting undue advantages intended to influence decisions, acts, or omissions of public officials or any third party;
- report in good faith, through the channels defined by Epidata, any suspicion, attempt, or act related to bribery or non-compliance with this policy;
- cooperate in a timely and transparent manner in internal or external investigations related to the Anti-Bribery Management System.

Reporting channels and non-retaliation

There is a whistleblowing mailbox at the bottom of the main section of Epidata's website, where suspicions or acts related to bribery can be reported.

Epidata guarantees the confidentiality of reports and protection against retaliation for those who report in good faith.

See: PR 60 Whistleblowing Management

	Publication	PL 16/01
	Anti-Bribery Policy	Effective date: 6/04/2026

Communication of the policy

This policy will be communicated and made available to all personnel and relevant third parties, including business partners, suppliers, and contractors where appropriate.

Epidata makes all personnel aware of the Integrated Management System Policies, including this Anti-Bribery Policy, seeking to ensure that the persons reached become aware of its content, and keeping a record of said communication through acknowledgment of receipt, accrediting its effective notification.

Consequences of non-compliance

Non-compliance with this Policy, the controls established in the Anti-Bribery Management System, or applicable anti-bribery legislation may result in the adoption of disciplinary measures with respect to personnel, in accordance with applicable internal regulations.

In the case of third parties, such non-compliance may give rise to the suspension, review, or termination of the contractual relationship, without prejudice to any applicable legal, administrative, or contractual actions.

Application of the Anti-Bribery Management System

EPIDATA implements the Anti-Bribery Management System through the definition and execution of processes, controls, and responsibilities integrated into its **Integrated Management System**.

In particular:

- specific procedures have been established for the management of bribery risks, due diligence of business partners, selection of personnel and suppliers, and management of reports;
- roles and responsibilities have been defined, including the designation of an **Anti-Bribery Compliance Function**, with authority and independence to supervise the system;
- documented records are maintained evidencing the application of anti-bribery controls, including assessments, approvals, investigations, and actions taken;
- the processes of the Anti-Bribery Management System are integrated with the Quality and Information Security management systems.

Policies are approved by Management, and procedures by the corresponding process owner.

	Publication	PL 16/01
	Anti-Bribery Policy	Effective date: 6/04/2026



Adrián Anacleto

Approved: 6/04/2026