

Anti-Fraud Policy

Background

1. **Phunciona Gestión Hospitalaria, SA** (the Company) has a commitment to high legal, ethical and moral standards. everyone working on the Companies behalf (directly employed or otherwise is expected to share this commitment. This policy is established to facilitate the development of procedures, which will aid in the investigation of fraud and related offences.
2. The Company already has procedures in place [via its management services provider] that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control and risk assessment. In addition, the Company tries to ensure that a risk (and fraud) awareness culture exists in this organisation.
3. This document¹, is intended to provide direction and help to those officers and directors who find themselves having to deal with suspected cases of theft, fraud or corruption. These documents give a framework for a response and advice and information on various aspects and implications of an investigation. These documents are not intended to provide direction on prevention of fraud.

Fraud Policy

1. This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with this Company. Any investigative activity required will be conducted without regard to any person's relationship to this organisation, position or length of service.

Actions Constituting Fraud

1. Fraud comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting the financial statements by one or more individuals among management, staff or third parties.
2. All Managers and Supervisors have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.

¹ together with the Fraud Response Plan and Investigator's guide [as applicable and as source referenced]

Anti-Fraud Policy

The Board's Policy

1. The Board is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the Company. It is therefore also committed to the elimination of any fraudulent activity, and to the rigorous investigation of any such cases.
2. The Board wishes to encourage anyone having reasonable suspicions of fraud to report them. Therefore, it is also the Board's policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions (See the **Phunciona Gestión Hospitalaria, SA** Whistleblower and Grievance Policy for further information).
3. Members of staff can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud. For these purposes reasonably held "suspicions" shall mean any suspicions other than those, which are raised maliciously and found to be groundless.



Signed for and on behalf of
Phunciona Gestión Hospitalaria, SA

Casildo Sánchez Mantas

29th November 2022

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Director

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Date