

WIT Pharma Limited Liability Company

Anti-Corruption Policy

APPROVED by the General Director of WIT Pharma LLC, D. F. Klimchuk; approval date 15 January 2026.

1. Definitions

Terms defined in this Anti-Corruption Policy (the “Policy”) shall be construed broadly to align with the letter and spirit of WIT Pharma LLC (the “Company”) policy against bribery and corruption. Committed to the highest ethical and professional business standards, the Company declares zero tolerance for any conduct involving the promise, offer, provision or authorization of payments prohibited by this Policy.

Anything of value: cash and cash equivalents (gift cards and certificates), money transfers, gifts, services, offers of employment, loans, travel, entertainment, contributions to political parties and charities, grants, per diems, sponsorships, fees and any other benefits, even of insignificant value.

Payments: any direct or indirect offer or authorization to transfer (pay) anything of value.

Government official: any official or employee of a public authority or state institution; any person acting on their behalf; any officer or employee of an entity wholly or partly owned by the state; any officer or employee of a public international organization; any official, member or representative of a political party, or any candidate for public office.

Employee: an individual in an employment relationship with the Company under an employment contract.

2. Policy Statement

The Company’s policy against bribery and corruption requires compliance with the highest ethical standards and all anti-corruption laws in force in the countries where the Company operates (whether directly or through third parties). The Policy obliges all employees and any third party acting on behalf of or for the Company to ensure that all transactions in both the private and public sectors are conducted in accordance with applicable law and ethical business standards.

Affirming its commitment to ethical conduct and transparency, the Company firmly rejects corruption of any kind, regardless of the parties involved, including employees, officials and third parties. This Policy is an internal document of the Company.

3. Commitments

- Employees shall not, directly or indirectly, make payments or transfers, or convey anything of value in connection with transactions or other business dealings to: a government official or employee (including officers of state corporations or international organizations); a political party, its representative or a candidate; an intermediary for a payment to any of the above; or any person or entity where such payment would breach applicable anti-corruption law.
- Employees shall not make any payment or transfer of value intended or resulting in a bribe in the public or commercial sphere, nor permit extortion, kickbacks or any other unlawful means of obtaining an advantage.
- The Employee and the Company act in accordance with all applicable anti-corruption laws and regulations.
- The Company familiarizes each Employee with this Policy in writing; the Employee represents and warrants that they are not a government official, officer or political-party candidate, nor a close relative of such a person.

- Employees must promptly report any actual or suspected violation of this Policy. The Company enables anonymous reporting at info@witpharma.com and guarantees that no employee reporting in good faith will suffer any detriment.
- All contracts with third parties must include an anti-corruption clause.
- At least once a year all employees complete anti-corruption and business-ethics training; new hires complete it within three business days of joining.
- All amendments to this Policy are approved by order of the Company's General Director.

General Director, WIT Pharma LLC

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Approved document. The original bearing signature and seal is available on request.