

## **ANTI-BRIBERY POLICY**

Throughout its years of operation, the Company has been aware of the problem that exists worldwide in terms of bribery and corruption.

The Anti-Bribery Policy is the basis for the implementation and continuous improvement of the Anti-Bribery System, which has been designed in accordance with the requirements of the international standard ISO 37001:2016.

The company's goal is to fight bribery and corruption at all levels. To achieve this goal, the company follows the basic guidelines indicated below:

- ✓ Any form of bribery or the acceptance thereof is strictly prohibited.
- ✓ All employees are required to comply with the national or European Union bribery laws as applicable to the Company.
- ✓ It encourages the contribution of all employees to the identification and suspicion of any potential bribery and prohibits punishment or negative treatment of the employees in question.
- ✓ It is committed to implementing measures and providing the necessary resources to fight bribery and corruption.
- ✓ It sensitizes and properly trains its staff through continued regular anti-bribery updates and training.
- ✓ It has established a specific anti-bribery department, which is independent from the rest of the staff, reports only to the CEO and has the duty and authority to investigate every potential case of bribery, examine and assess the risks of bribery, and to implement respective measures to combat it.
- ✓ It continuously assesses the risk related to anti-bribery issues that may arise in the course of its activities. Through this assessment, it is able to prioritise the risks and opportunities as they present themselves.
- ✓ The Code of Ethics must be implemented by all company personnel, and all cooperating partners and other interested parties are bound by it.
- ✓ In the event of bribery or failure to comply with the requirements of the anti-bribery system, sanctions are imposed and in the event of violation of relevant legislative requirements, a report will be made to the competent authorities.
- ✓ The Company is committed to the continuous improvement of its anti-bribery system.

To achieve the above objectives, the company reviews and updates this Anti-Bribery Policy whenever deemed necessary. This policy constitutes an absolute commitment on the part of management and staff.

**VERSION: 01**

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**I. CONTELLIS  
CHAIRMAN & CEO**