

ANTI-BRIBERY POLICY

Our primary objectives and vision of our company are:

- The maintenance and continuous improvement of the Anti-Bribery Management System.
- To uphold high standards of ethical conduct by requiring all employees, business partners and other parties with whom the company cooperates to comply with this policy without exception.
- All employees, including the company's management, have been made aware of the company's anti-bribery policy and have received training and guidance on appropriate conduct in this regard.
- The company will not engage in bribery, corruption, facilitation payments or any other illegal act.
- The company only permits the receipt and granting of official donations in accordance with Greek government regulations where reasonable and commensurate with a relationship. Gifts are avoided if there is a risk that they may be perceived to influence decision-making.
- The company does not cooperate with companies involved in corrupt practices and, should it become aware of the involvement of a company with which it cooperates in such practices, it will immediately terminate any relationship with that company.
- Management and employees comply with the laws of the Greek state and the European Union regarding bribery.
- The company does not and will not participate in political or party donations. In the case of a charitable donation, such action is approved by the company's management.

In the case of the company's transactions with foreign individuals or entities, when foreign due diligence practices deviate from this policy, company management will evaluate and determine the adoption of due diligence practices to ensure that anti-bribery principles are respected prior to entering into and during the course of any relationship or partnership.

Company management, staff and associates shall use confidential reporting channels to raise concerns and complaints. In addition, all members of management are made aware of how to address concerns reported to them, and the concealment of such concerns and failure to investigate them is a serious disciplinary and perhaps criminal matter.

No retaliation is permitted because of the use of the whistleblowing channel by company staff or associates.

To achieve the above objectives, the Company has studied, designed, installed and operates an Anti-Bribery Management System in compliance with the ISO 37001 International Standard.

The objectives of this policy and their respective indicators are reviewed during the review of the Anti-Bribery Management System by the Company's management.

The Company's management is committed to fully support the Anti-Bribery Management System it has in place and to provide the resources required to implement the Anti-Bribery Policy and to continuously improve it. It is also committed to comply with applicable legislation, standards and regulations related to anti-bribery.