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|  | ANTI- BRIBERY POLICY | PAGE | CODE   |
|   |                      | 1    | POL-02 |

**COSTAS A. PAPAELLINAS HELLAS S.A.** applies measures and controls to prevent and combat bribery and acts with a view to ethical and financial integrity, protecting its reputation from the negative consequences of any possible involvement in bribery.

Through the implementation of the Anti-Bribery Management System, in accordance with the International Standard ISO 37001:2016 and always in compliance with the applicable legislation, the Company's Management is committed to:

- Comply with the Legislative and Regulatory requirements related to the combating of bribery, as defined by the National or Community legislation.
- Maintain a prohibitive attitude towards bribery for all employees and stakeholders.
- Identify internal and external issues related to bribery risks.
- Establish rules and principles for preventing, deterring and combating bribery and communicating them both internally and to external stakeholders.
- Manage its operation with zero tolerance to bribery/graft.
- Establish anti-bribery targets and appropriate mechanisms to review and achieve them.
- Educate and continuously train all its staff to recognize and avoid actions linked to bribery.
- Encourage the confidential reporting of any suspicion of bribery in good faith, without fear of retaliation.
- Ensure a complaint handling mechanism through appropriate channels of communication, respecting confidentiality and the protection of individuals.
- Promote an appropriate anti-bribery culture within the organization and support managers to take the lead in preventing and detecting bribery in their areas of responsibility.
- Make every effort to continuously improve the effectiveness of the Management System with the involvement of employees.

To achieve the above objectives, Management provides the framework and resources necessary for the smooth, efficient and effective operation of the Company and the Management System.

The Company has an independent Anti-bribery Compliance Function which is responsible for the design and implementation of the Anti-Bribery Management System, provides guidance and advice to the staff, ensures the compliance of the Management System with the requirements of ISO 37001:2016 and reports on the operation of the system to the Company's Management.

This Policy has the approval of the Management and is binding on staff and external stakeholders.

On behalf of the Management of **COSTAS A. PAPAELLINAS HELLAS S.A.**

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| <b>VERSION. REVISION / DATE:</b> | <b>ISSUE:</b> | <b>APPROVAL:</b> |
| 01.00 / 01.09.2024               | QA            | GENERAL MANAGER  |