

Anti-bribery Policy

June 2022



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Our Vision and Scope

"Grant Thornton Tax and Business Advisory Solutions Societe Anonyme" and the "Grant Thornton Chartered Accountants and Management Consultants Societe Anonyme" (hereinafter referred to as the "Company") **strive to maintain a transparent and trustworthy business climate in line with high business ethics standards.** As a consequence, the Company's Management has implemented the Anti-bribery Management System, in accordance with the provisions of the International Standard EN ISO 37001: 2016.

The key objectives our firm has established regarding anti-bribery are as follows:

- Unconditional compliance with all the legal and regulatory anti-bribery requirements
- Universal prohibition towards bribery regarding all our partners and employees
- Zero tolerance of bribery and corrupt activities
- Establishing anti-bribery objectives and appropriate mechanisms that facilitate and update them
- Encouraging our employees to report the relative incidents in good faith and through reasonable suspicion - without fear for retaliation
- Ensuring whistleblowing scheme management with confidentiality
- On-going training our people so that they could achieve the objectives
- Ongoing provision of information and encouragement to our suppliers and collaborators regarding anti-bribery awareness
- Risk assessment regarding anti-bribery issues that may arise during the Company's operations
- Conduct of internal anti-bribery reviews at regular intervals by independent inspectors
- On-going training our people aimed at acquiring the required anti-bribery sensitivity.
- Full compliance with the Anti-bribery System in accordance with the requirements of the International Standard EN ISO 37001: 2016 and seek its continuous improvement.

Management is committed to monitoring and updating this Policy on a regular basis to confirm that it remains relevant and effective. The employees are responsible for its implementation.

Introduction

Bribery is the act of requesting, receiving, offering, promising or providing money or other undue and unlawful benefit by or to an employee of a company or Public Official in order to secure a commercial or personal advantage.

Examples of payments and actions used in Bribery are the following:

- (a) giving or receiving money or anything else that could be considered valuable,
- (b) personal favours and quid pro quo deals ;
- (c) illegal commissions,
- (d) promise of additional business activities,
- (e) expensive trips, accommodation and participation to events of nonbusiness purposes, (f) payment of personal and/or family expenses (prepaid cards or gift cards),
- (g) loans from suppliers that are never repaid,
- (h) request to be paid in order to perform an action..

Bribery, which entails civil and criminal liability in accordance with the applicable legislation, is classified into active and passive bribery:

(a) Active bribery: anyone who promises or grants to an employee, directly or through a third party, any manner of unlawful benefit, for an action or omission, which falls under their duties or is contrary to them..

(b) Passive bribery: employees who, in violation of their duties, request or receive, directly or through a third party, for themselves or on behalf of a third party, any manner of unlawful benefits for their action or omission, which falls under their duties or is contrary to them .

Scope of Implementation

Anti-bribery Policy applies to the Company's Management Team, the Employees and the Counterparties. Personal commitment of all the Company's executives and senior managers to supporting an anti-bribery culture (Top Management Commitment) plays a strategic role in promoting a culture of legitimacy at all levels. Rejection of any practice of bribery and corruption as well as the Company's executives absolute commitment to the principles of ethics and integrity are clearly and explicitly defined. All the Company's employees - regardless of their ranks, positions, roles or duties – shall be aware that long-term business success can only be achieved if compliance constitutes an integral part of all the corporate activities and business transactions.

This Anti-bribery Policy also governs establishing relationships with any Counterparty intending to enter into a business relationship with the Company, as well as retaining such business activities. All the aforementioned persons shall be aware of and comply with this Anti-bribery Policy and the effective regulations while performing their duties to ensure that the Company is not exposed to the risk of sanctions and severe damage to its business reputation.

For the Company's personnel, any breach of this Policy constitutes a breach of the terms of the employment contract and may bring about disciplinary action, enabling the Company to terminate the employment contract and/or consider any other action taken in order to protect it before the competent authorities.

Policy Framework

Offering or accepting any form of undue payment, undue advantage or bribery has no place at our Company. The Greek Legislation - the Greek Penal Code, in particular – explicitly prohibits bribery. The aforementioned regulations as well as the European and international legislation, such as OECD Anti-Bribery Convention, impose heavy sanctions on the companies and individuals who violate them, including substantial fines and imprisonment for natural persons.

Transactions with Public Officials

It is expressly forbidden to directly or indirectly provide, offer or promise any benefit to Public Officials. This Policy prohibits even "facilitation payments", insignificant value payments and gifts to Public Officials for the purpose of inciting them to engage in improper conduct in the course of their duties.

The following are considered "government officials":

- Officials, employees or representatives of any government, department, agency, office, authority, instrumentality or public international organization. A public international organization is an organization formed by states, governments or other regional or supranational bodies. It would include, for example, the United Nations, the Organization of American States (OAS) and the International the Red Cross.

- Persons acting on the government's behalf;
- Employees of entities that are owned or controlled by the government, and
- Candidates for political office.

Transactions with private entities and non-public natural persons

Transactions not involving Public Officials also require due care and diligence to ensure that the staff and – consequently - the Company act with utmost integrity.

Under no circumstances shall any benefits, advantages or any object of value be offered to any person not permitted to receive it, or be intended to improperly influence any business decision.

The executive in charge of addressing the matters relating to this Policy should be duly updated, as set forth below, and the prior written approval of the Hierarchical Supervisor is required before providing or offering anything we deem may adversely affect a business decision, unlawfully influence a decision-maker or make the recipients violate any duties to their employers.

Corporate hospitality and gifts

The Policy does not prohibit fair, reasonable and legitimate hospitality (offering or accepting) to or from third parties, if its purpose is to improve the Company's image, presentation of its services or establishment or maintenance of business relations.

Employees are permitted to offer or receive gifts or hospitality at a reasonable, proportionate, justified level in accordance with this Policy. According to the Company's Code of Ethics, gifts and corporate hospitality under € 200 are deemed insignificant.

Further details regarding corporate hospitality and gifts are analytically presented in the relevant section of [Company's Code of Conduct](#).

Awareness and responsibility

All the Company's employees shall ensure compliance with this Policy. Hierarchically responsible partners/project managers should ensure that their subordinates receive the guidance and training they need in order to perform their duties in accordance with this Policy and applicable legislation.

The Company ensures the necessary training to improve the employees understanding of the content of the Policy and raise their awareness of bribery issues.

Conflicts of Interest

Conflicts of interest arise when the interest of an individual interferes or appears to interfere with the interests of the Company. A conflict of interest can turn into a bribery issue when an employee requests, agrees to receive or receives an item of value, which interferes with the employee's judgment in the exercise of his/her duties on behalf of the Company.

Examples of cases, where a conflict of interest may arise, include a personal interest in a contract, employment outside the Company, use of the Company confidential information in a personal transaction, or pursuit or acceptance of gifts or entertainment exceeding the aforementioned limit.

Therefore, employees are not allowed to engage in activities that involve, or could involve, any conflict of interest.

Record keeping

The procedure, established for keeping all the records deemed necessary to ensure sound implementation of this Policy, is analytically presented in the relevant section of the [Company's Code of Conduct](#) .

Violations and sanctions

The Company has zero tolerance of any conduct that does not comply with the Anti-Bribery Policy. Any violation of the Policy's principles shall be regarded as a very serious incident of professional misconduct and carries penalties, in accordance with the Company's Internal Regulations.

Such disciplinary penalties shall be decided on a case-by-case basis, depending on the nature and gravity of the conduct in question and the identified violation based on the proportionality principle, and all cases are managed with consistency based on the principle of equality. Any disciplinary penalties shall be imposed without reservation to the provisions of the existing legislation.

Submitting Reports and Complaints

The process of submitting, managing and investigating any report/complaint, including the cases described in this Policy, as well as the principles governing data analysis, record keeping, personal data protection and retaliation acts protection regarding a report/complaint is analytically described in Company's [Whistleblowing Policy](#) .

Furthermore, the Company has established a [Whistleblowing Scheme](#) , centrally available to all the Company's personnel at the corporate Sharepoint.

Monitoring and Control

The Company has appointed an executive specifically responsible for managing the issues related to this Policy (Ms. Ioanna Vourvoulia, ioanna.vourvoulia@gr.gt.com).

This executive is primarily responsible for the following:

- Ensuring personnel contact for the personnel regarding the arising issues and the clarifications required under the implementation of this Policy.
- Facilitating annual personnel training on issues related to the Anti-bribery Management System
- Completing the Job Description in matters concerning the Anti-bribery Management System in collaboration with the Head of the Human Resources Department,

- Participating in selecting the training personnel, training programs and trainees in the Anti-bribery Management System matters
- Ensuring the operation of the Company's Anti-bribery Management System
- Participating in the investigation of any reported cases of bribery
- Supervising the implementation of all legal and regulatory requirements related to anti-bribery
- Directly accessing the Management Committee and the Board of Directors.

Policy Approval and Review

Anti-bribery Policy is approved by the Board of Directors of the Company, disclosed to the employees and updated and posted both – in the corporate intranet in the SharePoint and the Company's official website.

The Company reviews and revises Anti-bribery Policy on an annual basis depending on potential changes in the applicable legislation or followed practices and, generally, whenever deemed necessary. In such cases, the most recent Policy is always uploaded.



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