

ANTI-BRIBERY POLICY

The Company adopts a policy of zero tolerance towards all forms of bribery, whether active or passive, and prohibits bribery in any form, including any financial or other advantage, whether direct or indirect (such as the provision of business opportunities, employment, favorable contracts, donations, travel, gifts, or hospitality), intended to obtain, retain, or secure an improper business advantage for the Company.

In this context, the Company has implemented and integrated the requirements of ISO 37001:2016 – Anti-Bribery Management System into its Management System and commits to its effective application and continual improvement.

The Company's anti-bribery controls and preventive measures are defined within the procedures of the Management System and include, but are not limited to, the following:

- Identification and assessment of bribery risks.
- Compliance with all applicable anti-bribery laws and regulatory requirements.
- Implementation of policies, procedures, and controls to ensure ethical business conduct.
- Periodic review of the suitability and effectiveness of the Anti-Bribery Policy.
- Establishment of measurable anti-bribery objectives.
- Performance of due diligence on personnel and relevant business associates.
- Ongoing training and awareness programs for personnel to prevent bribery and encourage reporting.
- Protection of whistleblowers against retaliation.
- Assurance of the independence and impartiality of the anti-bribery function.
- Provision of secure and confidential channels for anonymous reporting.
- Fair, objective, and timely investigation of suspected bribery and the application of appropriate disciplinary and corrective actions.

The Management Body reviews the Anti-Bribery Management System and its objectives at planned intervals to ensure its continuing suitability, adequacy, and effectiveness.

Top Management is committed to providing the necessary resources to establish, implement, maintain, and continually improve the Anti-Bribery Management System.

All Company departments and personnel are responsible for complying with and implementing the requirements of the Anti-Bribery Management System as part of their daily activities.

Furthermore, Top Management ensures that this Anti-Bribery Policy is communicated, understood, and applied throughout the Company.

The Board of Directors