



ANTI CORRUPTION REGULATION

Our working methods safeguard and promote
our Group's reputation and customers

December 2022 (V4)

Human Resources & Culture Management Department

The way we work

Customer satisfaction and operational efficiency are business priorities for Attica Group. We are fully committed to operating with business ethics, integrity and transparency, in full compliance with all laws and regulations.

Attica Group demonstrates zero tolerance for instances of corruption throughout its business operations, whether these originate from its employees or its social partners.

According to the United Nations,
‘The cost of corruption exceeds by far
the damage caused by
any other individual crime’

1. Our viewpoint is clear

We do not offer nor accept any form of bribery, and we do not tolerate corruption in our business transactions.

The Attica Group Anti-Corruption Regulation serves as a guide for professional integrity and practices that promote business ethics. It sets out the behaviours expected of employees, helps us make ethical decisions, and explains how we can identify potential misconduct.

The term “**corruption**”¹ generally refers to reaping or attempt to reap a personal benefit or business advantage through improper or illegal means.

Corruption may involve payments or the receipt of any item of value, and includes the following activities:

- Bribery
- Extortion
- Illegal fees

Bribery is defined as “any offer or acceptance of any gift, money, loan, fee, reward or other privilege or benefit, by or to any person, as an inducement for the improper or selective conduct of that person’s business, particularly when the offer or acceptance of any gift is fraudulent, illegal or in breach of confidentiality”.

We have accepted and co-signed the
“**Call for Action**” initiative of the
United Nations Global Compact in
order to implement policies and
practices for the effective handling
of corruption

¹ INTERNATIONAL TRANSPARENCY <https://www.transparency.gr>

It is strictly prohibited for all employees and any person acting on behalf of our Group to offer or accept, directly or indirectly, **money and any other item of value –with aggregate value over 100 Euro per calendar year–** to/from any person directly or indirectly representing a Customer, Agent, Supplier or any other Social Partner.

Irrespective of any criminal liability, any proven involvement of a staff member in cases of bribery/venality will cause the Group to lose any confidence in that person, and will lead to the immediate termination of their employment.

Any act of corruption undermines the respect for the rule of law, damages our trade name and reputation, and may result in legal consequences for the Group.

Items of value

Cash or cash equivalent, labour, position, contract, gifts, entertainment or accommodation, fees, compensation or expenses, facilitation payments, etc.

2. Collaboration with Customers, Agencies, Suppliers and other third parties.

Attica Group collaborates with Customers, Agents, Suppliers and third parties, including consultants and other business partners.

All Customers, Agents, Suppliers and other third parties are expected to understand and comply with this Regulation and the current anti-corruption laws.

They are also expected to ensure that their own subcontractors understand and comply with this Regulation and the current anti-corruption laws.

Any business partner who fails to meet and respect our standards shall be excluded from our Group's operations, including even the cancellation of existing agreements.

Our employees are aware of Attica Group's zero-tolerance policy against corruption.

Wilful blindness ("this is not my responsibility" or "this falls within ordinary course of business

Wilful blindness is no excuse.
and everybody does it") is no defence to any accusation of bribery or corruption. Any conscious indifference to suspicious activities that require further investigation and control can lead to the criminal and/or civil liability for both the Group and for the employees.

Accordingly, and under these circumstances, any **wilful blindness and conscious indifference are explicitly prohibited.**

When transacting with third parties, our employees must be alert to “**red lines**” that may determine bribery risks, such as:

- Failure to comply with the Regulation of Professional Conduct & Business Ethics;
- Invoices/expenses without the corresponding approval and the necessary supporting documents;
- Insistence on using a Consultant or external partner with little or no apparent added value;
- Other actions, not conforming with the practices of the Group.

If you have identified one or more of the above “**red lines**” please contact the Attica Group Transparency Committee (section 11 herein).

3. Gifts and entertainment expenses

Our general practice is to act prudently and consistently, always taking into account our Group’s Principles and Values. In all cases, however, it is illegal to give money or any other item of value (such as gifts or entertainment) to secure an unfair advantage.

In any case, there are some important rules that must be followed:

- Never take nor give *items of value* to influence a decision or to get special treatment;
- Never offer gifts, travel and business trips secretly or through a third party;
- Never offer money as a gift;
- Never offer/accept gifts, even if **they are not expensive**, when handling agreements or at any stage of a tender;
- It is not appropriate to frequently offer gifts to the same person, even if **they are not expensive**;
- A “**gift**” is **expensive** when its value is more than one hundred Euro (€100), even if it is acquired in instalments, over the course of a calendar year.

4. Professional Gifts

The practice of offering or receiving a business gift to or from a customer or supplier or other business partner must be handled with caution. Before offering/receiving such a gift, it should be clear whether it is permitted under our Principles.

Offering or accepting any gift that serves or appears to influence business decisions or offers an unfair advantage is prohibited.

However, in some circumstances, business gifts are permitted for the purpose of promoting good faith, provided that:

- The gift has a legitimate business purpose and is of small value;
- The gift must not be cash or cash equivalents;
- The gift is permitted by the laws and policies applicable to the recipient.

Business hospitality, including meals and entertainment, is not prohibited, provided that their nature and frequency are reasonable, that they are close to the Group’s business plans, and are primarily related to ongoing events.

5. “Facilitation Payments”

Facilitation payments are payments required by employees or third parties to perform the actions they are already obliged to perform, or to expedite the performance of an ordinary or necessary action that falls within their duties.

Attica Group does **not** permit facilitation payments.

6. Conflict of Interests

A conflict of Interest is described as a situation where the personal interests of employees and parties related to them conflict with the interests of the Group. As a general principle, it is recommended to detect and avoid in time such situations where the personal interests of employees affect or may affect their judgement while they are acting on behalf of the Group.

Examples of such cases of conflict of interests are cases where the employee:

- May gain financial profit or prevent financial loss at the expense of the Company or its affiliates.
- Has an interest that does not coincide with the interests of the Company or its affiliates.
- Has an interest in the outcome of a service, transaction or other activity that differs from the interests of the Company or its affiliates.
- Receives, or may receive a consideration, from a person outside the Company, related to the Company's activities, when this consideration takes the form of money, goods or services. Such an example is the assignment of work to family members or friends, external partners, etc., which does not coincide with the Company's needs, for the purpose of direct or indirect financial gain.
- Has any type of direct or indirect participation in the activities of a Company partner or of affiliates or said partner. In any case, any type of direct or indirect participation in the business activities of a Customer, Agent or Supplier, or in general an external partner of the Group, is considered in principle to fall under “Conflict of Interest” and the Corporate Governance & Regulatory Compliance Department should be informed in writing.
- Has a family relationship with a superior or subordinate within his/her division/department. Instead, necessary steps should be taken to ensure that employees who are related work in different divisions/departments and should definitely not have a hierarchical relationship of superior-subordinate.

Any employee who has any doubt regarding any action or who believes that his/her personal interests conflict or may conflict with those of the Group can inform the Corporate Governance & Compliance Department in writing.

7. Accuracy & Completeness of Records

We ensure –each one in our own field– that all relevant records regarding the Group’s activities accurately reflect our business transactions. Never conceal facts, omit important information or amend records or reports in such a way as to mislead other persons, and never assist other persons to act accordingly.

Ensuring the accuracy and completeness of business and financial records is the responsibility of everyone, not just the duty of Finance Division.

8. Donations/Sponsorships

As we seek to substantially contribute to the improvement of the quality of life and well-being of society as a whole, any donations/sponsorships are permitted within the framework of the Group's principles. However, special care must be taken to ensure that any such donation or sponsorship is not used as a cover for bribery.

9. Stand clear of Grey Areas

Advice on avoiding 'grey areas':

- When in doubt or concerned, just ask questions & clarify.
- Don't let any questionable behaviour go unnoticed. Thoroughly examine the rules of compliance and encourage others to do the same.
- If you hear rumours of improper payments or other suspicious activities, do not ignore them! Contact the **Attica Group Transparency Committee** immediately.

Without integrity we will never achieve
the desired results.

10. Prohibition of Retribution

Attica Group values any help by employees when identifying potential issues that need to be addressed, since the detection of potential incidents of corruption is everyone's responsibility.

Any retribution action against an employee who raised an issue in good faith is a violation of the Regulation of Professional Conduct & Business Ethics.

The fact that an employee raised a concern in good faith should not be used for any adverse action or discrimination against them in the workplace.

11. Corruption Awareness Mechanism

The competent body to inform in cases of corruption is the **Attica Group Transparency Committee**, which is composed of:

- The President of the Board of Directors' Audit Committee;
- The Internal Audit Director;
- The Director for Legal, Insurance & Corporate Affairs.

Any Attica Group employee who discovers an act of corruption, or believes that there is cause for concern, should refer the matter to the Transparency Committee.

Any person who is interested in reporting such an issue is advised to use the appropriate channels of communication, making every effort to ensure that the information provided is as clear, complete and substantiated as possible. It is required to provide information on:

- the nature and circumstances of the alleged infringement;
- the timing of the infringement;
- the persons involved.

All complaints shall be submitted through the following communication channels:

- E-mail: conductline@attica-group.com
- By post to the
Attica Group Transparency Committee
PC 76090