

Anti-Corruption Policy

Preamble

This document outlines the Policy adopted by the Company for preventing and deterring practices of corruption, fraud, collusion, and bribery in its activities.

1. Introduction and Purpose of this Policy

Maintaining high ethical standards in compliance with national and international laws is a guiding principle for the Company and permeates all its activities and operations. The Company is committed to carrying out its work and activities in accordance with applicable national and EU legislation and business ethics, and this commitment is embodied in this Code. The Company believes that, at the business level, involvement in corruption undermines the reputation and reliability of the company in the market, leads to criminal consequences, civil liabilities, and other legal risks and financial damage (in the case of fines), increases operational costs, damages employee commitment and trust, creates a negative attitude and culture, and leads to exclusion from potential business opportunities. Moreover, prohibiting corruption practices is a benchmark for the smooth functioning of the economy, development, and progress.

Therefore, the purpose of this Anti-Corruption and Bribery Code is the full compliance of the business, its employees, and its external partners with applicable relevant legislation at both national and EU levels.

Ensure that you read, understand, and comply with this Policy.

2. Who is Covered by the Policy

This Anti-corruption Policy applies to all individuals working on behalf of the Company or representing it at all levels or involved with it in any way.

3. Definitions

- Corruption Practice: The abuse of a public or private office for personal gain.
- Bribery Practice: The offering, promising, or payment of money, gifts, or anything offered to a person in a position of influence to affect their behaviour, decisions, beliefs, or to gain an improper advantage.
- Fraud Practice: Any act or omission, including the distortion of facts, where someone knowingly or negligently misleads or attempts to mislead someone to gain an economic or other benefit or to avoid obligation (including tax fraud).
- Collusion Practice: The practice where two or more parties enter into an agreement to achieve an improper purpose, including improper influence over the actions of others.

4. Requirements

Corruption undermines public trust, threatens national and global economic and social development, and poses significant barriers to fair trade. Therefore, preventing, detecting, and reporting bribery and other forms of corruption is a priority and responsibility for all those who work for us or under our control. All Staff must avoid any activity that could lead to a violation of this Policy, whether by Staff or business partners.

The Company and its employees are committed to following ethical business practices, behaving with transparency and integrity, and complying with both applicable national and EU laws, regulations, and standards, as well as global policies aimed at preventing corruption risks.