

Anti-Corruption and Anti-Bribery Policy

Regulatory Compliance | Business Ethics



ΕΝΕΡΓΕΙΑ & ΥΠΗΡΕΣΙΕΣ
ΚΟΙΝΗΣ ΩΦΕΛΕΙΑΣ



ΤΡΟΦΙΜΑ &
ΕΦΟΔΙΑΣΜΟΣ



ΔΙΑΧΕΙΡΙΣΗ ΑΚΙΝΗΤΩΝ



ΜΕΤΑΦΟΡΕΣ & ΥΠΟΔΟΜΕΣ



ΤΕΧΝΟΛΟΓΙΑ



ΤΑΧΥΔΡΟΜΙΚΕΣ
ΥΠΗΡΕΣΙΕΣ

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1. Purpose

Corruption and bribery are amongst the most serious and challenging issues for modern business globally, threatening good administration, undermining economic and social development and distorting free competition.

Fulfilling the mission of the Hellenic Corporation of Assets and Participations S.A. (**Growthfund** or the **Company**) and safeguarding the public interest require high standards of principles and values. The requirements for integrity and transparency are particularly high and apply to every aspect of Growthfund's operations. We must therefore not tolerate any form of corruption or bribery, as well as behaviors, actions, or omissions that could expose the Company to risk or even raise a mere suspicion of corruption or bribery.

Recognizing the importance of combating corruption and bribery, and seeking to demonstrate its unwavering commitment to zero tolerance for such phenomena, Growthfund has established this Anti-Corruption and Anti-Bribery Policy (**Policy**).

2. Scope

The Policy applies to all Growthfund's employees and partners, regardless of position, including the members of the Company's Board of Directors and Corporate Governance Council. It also applies to any other third party acting on Growthfund's behalf.

The Policy also sets out the guidelines for the Growthfund's subsidiaries, which establish and implement similar policies and procedures to ensure compliance with their respective requirements.

3. Zero tolerance

Compliance with the applicable legal and regulatory anti-corruption and bribery framework is mandatory for everyone. Growthfund demonstrates zero tolerance for any behavior or suspected behavior that does not comply with this Policy. Such misconduct is unlawful and entails, without exception, the termination of the employment or cooperation relationship with Growthfund, along with all actions provided for by law.

4. Forms of corruption and bribery

Growthfund stands firmly against all forms of corruption and bribery, whether committed directly or indirectly through third parties or intermediaries.

4.1 Corruption and bribery

Corruption: the abuse of power, position, or capacity for personal gain (monetary and/or non-monetary). Indicatively, it includes situations such as bribery, extortion, nepotism, embezzlement of funds, and conflict of interest.

Bribery: Any form of promise, provision, offer, or acceptance, whether direct or indirect, to/from a person employed under any type of relationship in the public and/or private sector, of benefits and the securing of an undue advantage of any kind for themselves or for a third party, with the aim of performing or omitting an act in breach of their duties.

Bribery is classified into one of the following categories:

- "active bribery" occurs when a person offers, promises, or gives a bribe and
- "passive bribery" when a person requests, receives, or accepts a bribe.

4.2 Facilitation payments

Facilitation payments are those made to carry out or expedite processes for necessary or routine services that we are legally entitled to have performed. All types of facilitation payments are prohibited and illegal under the applicable legislation. If you are asked for such payments, you must report it immediately to Growthfund's Regulatory Compliance Officer.

4.3 Third-party due diligence

The Company may be held liable for acts of corruption and bribery committed by third parties performing work on its behalf. Before initiating cooperation and signing the relevant contract with any third party, and in accordance with the due diligence process, Growthfund's Procurement Officer (with the support of the Regulatory Compliance Department) must verify, among other things, that the reputation, standing, and capabilities of the said party are adequate and satisfactory, and that cooperation with them is not likely to pose a risk to the Company.

In all cases, third parties must be contractually bound to combat corruption and bribery and to act in accordance with Growthfund's business principles and values, as set out in the

Supplier Code of Conduct. Further information is contained in the Third Party Due Diligence Policy.

4.4 Anti-Money Laundering

Growthfund is committed to the effective combating of money laundering originating from illegal/criminal activities. To address such phenomena, the Company implements appropriate measures both in relation to the assessment of third parties with whom it cooperates and conducts transactions (including checks for money laundering and screening against lists of individuals subject to international economic sanctions), as well as through the continuous training of employees to prevent such occurrences. We must therefore all comply at all times with the applicable legislation and report any suspicious transaction to the Company's Regulatory Compliance Department.

4.5 Political contributions, donations to political parties

No contribution, donation, financial support, or any other form of provision or facilitation is permitted to political parties, movements or political organizations, party representatives, government officials, or candidates for public office. For any clarifications, please contact Growthfund's Regulatory Compliance Department.

Growthfund employees and partners, in the event that they make such contributions within the limits set by law, personally (on their own behalf and using their own funds), must not do so with the intent to influence a third party for the benefit of the Company. In all cases, they must exercise particular caution to ensure that these are not in any way perceived as contributions from the Company or directly or indirectly associated with it.

4.6 Charitable donations and sponsorships

As part of Growthfund's corporate social responsibility initiatives, the Company may make donations for charitable purposes or sponsorships for activities related to its scope, always in line with the Company's vision, mission, and Strategic Plan.

The Company's Sponsorship and Donation Policy defines the implementation framework, the core principles, and the procedure to be followed prior to the provision of any sponsorship or donation and through to its execution stage. Responsible business and ethics policies and procedures established by the Company play a significant and binding role in the implementation and management of sponsorships and donations, ensuring that all transparency requirements are met regarding the effective use of allocated resources.

In all cases, and in accordance with the prescribed due diligence procedures, it must be ensured, among other things, that the activities, reputation, and standing of the specific organization are adequate and satisfactory, and that any potential donation or sponsorship to it is not likely to pose any risk to the Company.

Furthermore, all transparency requirements must be met regarding the effective use of resources allocated for donations/sponsorships, and under no circumstances should any donation or sponsorship aim to secure an undue advantage.

4.7 Gifts and hospitality

Offering or accepting small non-monetary corporate gifts and hospitality is permitted only in the context of the usual social decency and business practice, and should in no way be aimed at or give the impression that it is aimed at inducing actions or omissions. Further information is contained in the Gifts and Hospitality Policy.

5. Information and Training

Growthfund ensures the continuous awareness, sensitization, and training of its employees on matters related to combating corruption and bribery. In this context, the Company's Regulatory Compliance Department communicates relevant messages and also develops and implements training programs.

6. Violations and reports

Anyone who commits and/or unlawfully conceals or suppresses the commission of the offence of corruption or bribery in the course of their duties shall be held liable under the law (including the initiation of criminal prosecution), and their employment or cooperation with the Company shall be terminated.

Violation of the relevant legislation may have significant consequences not only for the individuals involved but also for Growthfund. The Company encourages its officers, employees and associates to immediately report all cases of potential corruption and bribery.

The Company adopts and implements a reporting management system (whistleblowing system) for irregular and inappropriate behaviors, which plays a decisive role in raising awareness and preventing similar incidents. It is an international practice that includes effective and secure reporting channels for Growthfund and its subsidiaries. To this end, the SAFEVOICE reporting platform has been established, which can be accessed via the following web address: <https://safevoice.growthfund.gr>

An uncompromising principle is the protection of the confidentiality of the data of individuals who make such reports. Only in this way can it be ensured that Growthfund's principles and values, as well as the rules of ethical and professional conduct, will continue to be upheld, and that the Company will be able to take any corrective actions required. Therefore, if we identify behavior that causes us concern, we are obliged to report it through the available internal reporting channels.

The Company will protect those who, in good faith, express a concern or submit a report. However, it reserves the right to take any measures it deems appropriate against an employee or partner if it is proven that they have knowingly and intentionally provided false information regarding potential violations of the relevant legislation.

More information is included in Growthfund's relevant Whistleblowing Policy.

7. Policy Management and resolution of questions

The Policy is managed by the Regulatory Compliance Department, which works closely with the Company's other departments, as deemed appropriate, to jointly address any issues that may arise. The Policy is reviewed periodically with regard to the need for its revision.

For any questions or concerns regarding compliance with this Policy, you may consult the Company's Regulatory Compliance Department, which is also responsible for managing any issues that may arise during its implementation.