

Third-Party Due Diligence Policy

Regulatory Compliance | Business Ethics



ΕΝΕΡΓΕΙΑ & ΥΠΗΡΕΣΙΕΣ
ΚΟΙΝΗΣ ΩΦΕΛΕΙΑΣ



ΤΡΟΦΙΜΑ &
ΕΦΟΔΙΑΣΜΟΣ



ΔΙΑΧΕΙΡΙΣΗ ΑΚΙΝΗΤΩΝ



ΜΕΤΑΦΟΡΕΣ & ΥΠΟΔΟΜΕΣ



ΤΕΧΝΟΛΟΓΙΑ



ΤΑΧΥΔΡΟΜΙΚΕΣ
ΥΠΗΡΕΣΙΕΣ

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1. Purpose

Hellenic Corporation of Assets and Participations S.A. (**Growthfund** or **the Company**) applies high standards of transparency and integrity across the entire organization (including its subsidiaries) and expects all third parties (e.g. service providers, subcontractors, suppliers) with whom it cooperates or transacts to fully uphold its principles and values, and to demonstrate professional and ethical conduct.

The relationships of Growthfund with third parties with which it cooperates or transacts must be governed by transparency, integrity, trust, respect, and honesty, thereby ensuring both the effectiveness of the cooperation or transaction and Growthfund's reputation and credibility. Within this framework, prior to initiating any business relationship with third parties, the relevant due diligence process must be applied, as outlined in this Third-Party Due Diligence Policy (**Policy**). The Policy also sets out the guidelines applicable to the subsidiaries of Growthfund.

2. Scope

This Policy covers:

- a. All third parties (legal and natural persons) that perform services for Growthfund or on behalf of Growthfund. These include, but are not limited to: Partners, subcontractors, service providers, financial/business advisors, law firms/legal counsel, public relations/communications consultants, human resources consulting firms, audit/accounting firms/advisors, security services, facilities management companies, and others.
- b. Suppliers (legal and natural persons) acting as vendors of goods, where the total value of the contract or order form exceeds €20,000 per project or in aggregate on an annual basis. In all other cases involving suppliers from whom the Company simply purchases goods (e.g. materials, consumables) below the specified threshold, the relevant due diligence process does not apply.
- c. By analogy, to entities/organizations falling within the scope of the "Sponsorships and Donations Policy."

The Policy does not apply in the following cases:

- ✓ for services/transactions between Growthfund and its subsidiaries;
- ✓ for services/transactions between Growthfund and public entities and organizations.

3. Due Diligence Procedure

This procedure applies to third parties falling under one of the categories described above, with whom Growthfund intends to establish a business relationship.

It must be completed prior to the commencement of any business relationship.

The Regulatory Compliance Directorate, in cooperation with the Procurement Officer and/or the relevant designated officer of Growthfund, oversees the implementation of this Policy (including checks related to anti-money laundering and screening against lists of individuals subject to international financial sanctions). Given the nature of Growthfund's activities, and prior to selecting and initiating cooperation or transactions with third parties, the following stages of the due diligence process must be followed to ensure, among other things, that the third party's reputation, standing, and capabilities are adequate and satisfactory, and that the collaboration does not pose a risk to the Company. The due diligence process is carried out in two stages, as described below:

3.1 First Stage: Profiling (assessment of risk level and suitability)

The Procurement Officer of Growthfund, as part of the third party's profiling process and in cooperation (where required) with the Regulatory Compliance Directorate of Growthfund, assesses the third party's risk level and suitability.

More specifically, at the First Stage, the Procurement Officer is responsible for collecting the necessary information and relevant supporting material regarding the third party, with the aim of forming its profile based on the following criteria:

- ✓ ownership/shareholding structure;
- ✓ organizational structure;
- ✓ operations, e.g. prior collaboration experience, area of activity.

For more effective control and assessment of the above, a questionnaire must be completed by the third party (Due Diligence Questionnaire), which is attached as **Annex I**. Additionally, a dedicated KYC tool is used for the aforementioned purposes (searching available lists of Politically Exposed Persons and sanctions).

If deemed necessary, the Procurement Officer may follow up after completing the above steps with clarifying questions to the third party and/or request additional supporting documents or evidence. In specific cases and where deemed necessary, additional sources of information regarding the third party may also be used, such as publicly available press reports and official sources.

3.1.1 Key risk indicators

For the initial assessment of the third party's risk level and suitability, a range of key risk indicators is examined. Particular attention is given to indicators suggesting that the risk level is elevated (red flags). Potential high-risk cases (red flags) regarding:

- a. the third party's establishment/location of operations
 - b. the third party operates in a country with a high level of corruption/bribery
 - c. the third party's organization/operations/affiliations
- there are indications that the third party lacks the necessary resources and expertise to provide the intended services/goods;

- the third party is an accountant, lawyer, or other service provider who generally appears to lack prior experience in delivering similar services;
 - considerable negative publicity about the third party and its recent activities;
 - potential conflict of interests;
 - reluctance to complete the questionnaire/provide the requested information;
 - investigations or sanctions against the company (and/or its officers) regarding corruption, bribery and financial or other crimes;
 - the third party has not established regulatory compliance and business ethics policies and procedures;
 - lack transparent corporate/shareholder composition of the third party (e.g. unknown shareholders);
 - the third party or its key executives have close family or other ties to Politically Exposed Persons, government officials, or public servants;
 - the third party has been recommended by a government official or public servant who is promoting the initiation of a business relationship.
- d. the nature/type of transaction with the third party
- unusually high remuneration or unusual payment method (e.g. multiple bills, prepayment),
 - the third party seeks to establish a business relationship without a signed agreement
 - reluctance to comply with the HCAP Supplier Code of Conduct or to sign Growthfund's relevant contractual anti-corruption and anti-bribery clauses.

3.1.2 Third-party profiling

In profiling a third party, the structure and ownership status of the entity are examined, along with its activities and any (completed or ongoing) investigations or sanctions related to corruption, bribery, financial crimes, or other types of offenses. This assessment takes into account information from the Questionnaire, the results generated by the KYC tool, and documentation provided in the supporting material.

Subsequently, in order to complete the third-party profile, the Procurement Officer conducts a written assessment of the risk level (indicative risk assessment form attached as **Annex II**).

Based on the above information and the analysis of the responses provided, the Procurement Officer (with the support of the Regulatory Compliance Department) assesses the risk level according to two potential categories: "**low**" or "**elevated**".

It is noted that third parties providing the following services are by definition assessed as posing an elevated level of risk:

- ✓ human resources consulting firms;

- ✓ communication and public relations firms, and
- ✓ legal services firms, legal advisors.

When the risk level is classified as **"low"**, the due diligence assessment is limited to a review of the information sources (as outlined above) based on:

- the corporate name;
- the trade name, and
- the names of significant shareholders, representatives, and senior executives of the third party.

In all cases, it is deemed appropriate to document the results of the risk assessment above in order to substantiate the final assessment. No further due diligence action is required, and the process is completed upon signature of the relevant low-risk contractual clauses (see "Second Stage").

In cases where the risk level is classified as **"elevated"**, enhanced due diligence must be conducted with the support of the Regulatory Compliance Department, in order to assess whether the Company could engage in cooperation with the specific third party. If the cooperation/transaction is approved, the third party will be required to sign the relevant elevated-risk contractual clauses in order to complete the process (see "Second Stage").

In certain cases, however, where indications are identified suggesting that the risk level is "elevated," as outlined in section 3.1.1 above, the prospective cooperation may prove to be unfeasible. Specifically, the following cases are cited:

- when investigations or sanctions are in place related to corruption, bribery, financial crimes, or other types of offenses;
- reluctance to complete the questionnaire/provide the requested information;
- if the Supplier refuses to comply with Growthfund's Supplier Code of Conduct and does not have a Code of Conduct equivalent to that of the Company.

3.2 Second Stage – contractual protection

In all cases, whether classified as "low" or "elevated" risk, third parties are contractually bound with respect to:

- anti-corruption and anti-bribery, and
- the fundamental principles of Growthfund's Supplier Code of Conduct.

Depending on the level of risk, the corresponding contractual clauses are signed as required, examples of which are attached as **Annex IV (A and B)**.

Specifically, in cases of **"elevated"** risk, Growthfund's Regulatory Compliance Department, in collaboration with the Procurement Officer, may inform and raise awareness among the Company's third parties regarding their compliance with the Supplier Code of Conduct, Growthfund's principles and values, the avoidance of conflicts of interest, and the fight against corruption and bribery.

In this context, the Company's third parties may be requested to attend and successfully complete relevant training programs provided by Growthfund.

If the third party requests a modification of the relevant contractual terms, the request shall be reviewed by the Regulatory Compliance Department, which will inform the Legal Department accordingly.

If the third party demonstrates unwillingness to comply with Growthfund's Supplier Code of Conduct and does not have an equivalent Code in place, or refuses to sign the relevant Growthfund's anti-corruption and anti-bribery contractual clauses, then the prospective cooperation may prove to be unfeasible.

In cases where third parties process personal data in relation to the Company, they must complete and submit the Due Diligence Declaration concerning personal data matters, which is attached to the Policy as **Annex II**.

With regard to personal data matters, in all cases where the third-party processes personal data as a data processor, it must sign an agreement containing terms related to its obligations as defined by national and EU legislation on personal data protection.

If the third party requests a modification of the relevant contractual terms, the request shall be reviewed by the Data Protection Officer.

3.3 Monitoring of the cooperation relationship

The Procurement Officer, with the support of the Regulatory Compliance Department where deemed necessary, monitors the Company's relationship with the third party, supplementing this oversight with periodic audits, if required, concerning any transactions or circumstances that may contravene the aforementioned provisions.

Monitoring includes updating the existing documentation on the third party using available sources of information and/or conducting a general assessment of the ongoing cooperation with the third party.

In all cases, the existing documentation is subject to review every 18 months.

In the event of entering into a new cooperation or renewing an existing one with the same third party, the due diligence process shall be carried out as normal, unless the time elapsed since the last completion of the relevant process is less than 18 months.

3.4 Record keeping

Growthfund maintains a due diligence record of third parties through an electronic contract management platform. The Company's Procurement Officer is responsible for maintaining and updating the electronic record.

4. Violations and reports

Violation of this Policy may have significant consequences for Growthfund.

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. For this purpose, the SAFEVOICE reporting platform has been created, which can be accessed through the following web address: <https://safevoice.growthfund.gr>.

The aim of the system is to provide the necessary encouragement and security for employees and associates of companies to immediately disclose incidents that affect the corporate reputation. 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 its rules of ethical and professional conduct, will continue to be upheld, and that the Company will be able to take any corrective actions required.

5. 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 clarifications regarding compliance with this Policy, you may consult the Regulatory Compliance Department, which is also responsible for managing issues that may arise during its implementation. For matters related to personal data, you may contact the Company's Data Protection Officer.

The due diligence questionnaire must be completed by the third party prior to entering into any contract or transaction with Growthfund.

1. GENERAL THIRD-PARTY INFORMATION	
Legal name	
Address	
Telephone	
Email	
Website	
In which country is the third party established?	
Main shareholders of the third party (i.e. natural or legal persons holding $\geq 10\%$ of the share capital)	
2. SCOPE OF SERVICES / TRANSACTIONS	
Third party's line of business	
Description of project/services to Growthfund	
Have you previously worked with Growthfund?	YES <input type="checkbox"/> NO <input type="checkbox"/> (If YES, please briefly describe the previous cooperation/services provided)

Does the present project/services constitute an extension of a pre-existing cooperation?	YES <input type="checkbox"/> NO <input type="checkbox"/> (If YES, please briefly describe the previous cooperation/services provided)
Have you previously worked with a company within Growthfund's portfolio?	YES <input type="checkbox"/> NO <input type="checkbox"/> (If YES, please briefly describe the previous cooperation/services provided)
Who will be responsible for the cooperation with Growthfund?	
Are subcontractors or other third parties expected to be involved in the specific project / provision of services to Growthfund?	YES <input type="checkbox"/> NO <input type="checkbox"/> (If YES, please add any details)
3. REGULATORY COMPLIANCE AND BUSINESS ETHICS	
To the best of your knowledge, have any sanctions (e.g. regulatory, criminal, etc.) been imposed on your company or key executives for violations of anti-corruption/bribery laws, financial crimes, or other offenses?	YES <input type="checkbox"/> NO <input type="checkbox"/> (If YES, please add any details)
To the best of your knowledge, has your company or any key executives been involved in current or past investigations or prosecutions related to	YES <input type="checkbox"/> NO <input type="checkbox"/>

corruption/bribery, financial crimes, or other types of offenses?	(If YES, please add any details)
<p>Have you established regulatory compliance and business ethics policies and procedures?</p> <p>(Including, at a minimum, a code of conduct, policies against corruption and bribery, money laundering, terrorist financing, in accordance with the relevant national framework, and ethical behavior)</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Do you provide your executives and partners with training on the above regulatory compliance and business ethics policies and procedures you have established?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Do you provide third-party partners – subcontractors/suppliers (who will be involved in the implementation of the project / provision of services to Growthfund) with training on the above regulatory compliance and business ethics policies and procedures you have established?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Have you established policies and procedures related to environmental protection?</p> <p>(Including, indicatively, issues of sustainable development, emissions, waste management, and climate change)</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>

<p>Have you established policies and procedures related to social responsibility?</p> <p>(Including, indicatively, issues of personnel health and safety, and protection of human rights)</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
4. POTENTIAL CONFLICT OF INTEREST	
<p>To the best of your knowledge, is there any executive or other key personnel who has previously worked at Growthfund or at one of its portfolio subsidiaries within the past three years?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>To the best of your knowledge, are any of the shareholders, partners, key executives, or senior management of your company Politically Exposed Persons (PEPs) or Close Relatives of Politically Exposed Persons, as defined by Law 4557/2018, or do they have any other relationship with government officials or public servants?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
5. DONATIONS (to be completed only if the third party receives donations from the Company)	
<p>Is the entity registered in one of the official registries maintained by the Ministry of Interior (https://okoip.gov.gr/CSOIS/home.html) and the Ministry of Labour (https://kalo.gov.gr/) respectively?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please provide details on how its activities contribute to the pursuit of its charitable purposes, as well as the number of individuals/groups that have benefited over the past five years.)</p> <p>(If NO, please complete the following questions.)</p>

<p>Are the purposes of the foundation/organization publicly available?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Does the statute of the entity/organization reflect its current operational purposes?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Does the entity/organization ensure that its funds and assets are used exclusively for charitable purposes and not for the benefit of specific individuals?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Are regular updates and relevant reports submitted regarding the activities and financial statements of the entity/organization?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Does the entity/organization allow staff and third parties to raise concerns and/or submit reports or complaints regarding its operations and activities?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>
<p>Is the entity/organization aware of its regulatory obligations and, if so, does it comply with them?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>(If YES, please add any details)</p>

The undersigned, in my capacity, hereby declare responsibly to Growthfund that the information I have provided in completing the above questionnaire is accurate and complete.

Third-party Details

Full Name:

Capacity:

Date:

Signature:

ANNEX II –**Risk Assessment Form Template***(for internal use only – to be completed by the Procurement Officer)*

Name of third party	
Questionnaire completed	YES <input type="checkbox"/> NO <input type="checkbox"/> (If NO, please add any details)
Is the third party established or operating in countries outside the European Union or the EEA?	YES <input type="checkbox"/> NO <input type="checkbox"/> (If YES, please add any details)
Are there any indications of elevated risk (e.g. negative publicity, signs that render the collaboration uncomfortable or suspicious, etc.)?	YES <input type="checkbox"/> NO <input type="checkbox"/> (If YES, please add any details)

RISK LEVEL	
Increased	<input type="checkbox"/>
Low	<input type="checkbox"/>
<u>Explanation:</u>	

Procurement Officer Details

Full Name:

Capacity:

Date:

Signature:

ANNEX III - Due diligence statement on personal data matters

The due diligence statement must be completed by the third party if it will process personal data.

1.	Please confirm that you comply with the General Data Protection Regulation (EU) 2016/679 and that your company has a Privacy Policy and/or related procedures in place.
2.	Please confirm that you have implemented appropriate technical and organizational measures to ensure the security and protection of personal data that you will process in the context of cooperation with our company.
3.	Please confirm that you will maintain Growthfund's data in a separate file.
4.	Please confirm that, with regard to Growthfund's data, you have implemented tiered access control systems.
5.	Please confirm that you implement a password system on your systems.
6.	Please confirm that, in the event your personnel access personal data from non-corporate devices, you take appropriate measures to protect personal data.
7.	Please confirm that you will implement procedures for managing personal data breach incidents and handling requests related to the exercise of data subjects' rights.
8.	If required, please confirm that you have appointed a Data Protection Officer.
9.	Please confirm that you provide training to your personnel on personal data protection and information security matters.
10.	Please confirm that you are able to ensure the secure deletion, destruction, or return to our company of all electronic or hard copy versions of personal data that you may process on our behalf, in accordance with applicable legislation.
11.	If a third-party subcontractor of your company will process personal data in the context of our cooperation, please confirm that you have a

	procedure in place to assess whether they provide adequate safeguards for the protection of personal data.
12.	Please confirm that, in the event of any transfer of personal data concerning our company outside Greece, you comply with applicable legislation.

The undersigned, in my capacity, hereby declare responsibly to Growthfund that:
a) I confirm the above; and b) a third-party subcontractor will not / will process personal data in the context of our cooperation. Furthermore, I hereby declare responsibly that the information I provided in completing the above questionnaire is accurate and complete.

Third-party Details

Third-Party:

Description of project/services to Growthfund:

Full Name:

Capacity:

Date:

Signature:

ANNEX IV**A. Contractual terms regarding corruption/bribery and avoidance of conflict of interest, for third parties assessed as “LOW RISK”**

- [X] [The third party] complies with its obligations arising from the provisions of environmental, social security, and other legislation established under European Union law, national law, etc. [The third party] declares that it has reviewed and accepts Growthfund’s Code of Conduct, to the extent applicable, which is attached hereto as an integral part.
- [X.1] [The third party], nor any of its employees, shareholders, representatives, or subcontractors, directly or indirectly, whether in private business transactions or transactions with the public sector, shall offer, give, or agree to offer or give (whether alone or in agreement with others) any payment, gift, or other advantage in connection with matters covered by this Agreement that: (i) would violate any applicable anti-corruption laws or regulations binding upon [the third party] or [Growthfund]; (ii) are intended to influence, do influence, reward, or do reward any person for an act that breaches the principles of good faith, impartiality, or trust, or that would be inappropriate for the recipient to accept; (iii) are granted to or for a public official with the intent to influence them in order to obtain or retain a business advantage; or (iv) would, in any case, be considered unethical, illegal, or improper by a reasonable person.
- [X.2] To the best of our knowledge, neither [the third party] nor any of its Affiliated Parties has (i) ever been found by a court of any jurisdiction to have committed any corrupt act (or similar conduct), (ii) ever admitted to having committed any corrupt act (or similar conduct), or (iii) ever been under investigation or suspicion of involvement in any corrupt act (or similar conduct). [The third party] declares and warrants that neither it nor its affiliated parties have committed any corrupt act prior to the date of this Agreement.
- [X.3] [The third party] declares that it is not in any legal or factual relationship or situation that places it in a potential conflict of interest or could otherwise raise suspicion that it is, to any extent, hindered from providing its services to the Company with the necessary efficiency and objectivity. In the event that, for any reason in the future, with or without the involvement of the third party, any legal or factual relationship or potential situation arises, the third party is obliged to immediately inform in writing Growthfund’s competent corporate body and is further required to remedy the aforementioned situation as soon as it is requested to do so by the Company. The Company reserves the right, at its sole discretion, to determine whether a conflict of

interest exists in relation to the associate/third party, regardless of whether such a situation is described above or not.

- [X.4] [The third party] shall immediately inform Growthfund's competent corporate body of any development that may materially affect its ability either to effectively perform its services to the Company or to comply with applicable legislative provisions and regulatory requirements.
- [X.5] Without prejudice to the [Termination] clause, if Growthfund suspects that this clause [x] has been breached, it may terminate this Agreement without liability and with immediate effect upon written notice to [the third party].

B. Contractual terms regarding corruption/bribery and avoidance of conflict of interest, for third parties assessed as "HIGH RISK"

- [X] [The third party] complies with its obligations arising from the provisions of environmental, social security, and other legislation established under European Union law, national law, etc. [The third party] declares that it has reviewed and accepts Growthfund's Code of Conduct, to the extent applicable, which is attached hereto as an integral part(. Annex ...).
- [X.1] [The third party], nor any of its employees, shareholders, representatives, or subcontractors, directly or indirectly, whether in private business transactions or transactions with the public sector, shall offer, give, or agree to offer or give (whether alone or in agreement with others) any payment, gift, or other advantage in connection with matters covered by this Agreement that: (i) would violate any applicable anti-corruption laws or regulations binding upon [the third party] or [Growthfund]; (ii) are intended to influence, do influence, reward, or do reward any person for an act that breaches the principles of good faith, impartiality, or trust, or that would be inappropriate for the recipient to accept; (iii) are granted to or for a public official with the intent to influence them in order to obtain or retain a business advantage; or (iv) would, in any case, be considered unethical, illegal, or improper by a reasonable person.
- [X.2] To the best of our knowledge, neither [the third party] nor any of its Affiliated Parties has (i) ever been found by a court of any jurisdiction to have committed any corrupt act (or similar conduct), (ii) ever admitted to having committed any corrupt act (or similar conduct), or (iii) ever been under investigation or suspicion of involvement in

any corrupt act (or similar conduct). [The third party] declares and warrants that neither it nor its affiliated parties has committed any corrupt act prior to the date of this Agreement.

[X.3] [The third party] takes reasonable measures to ensure that Growthfund's Code of Conduct - of which a copy has been provided by Growthfund to [the third party] and is attached hereto as Annex [XX] - has been made available to its affiliated parties and any subcontractors or suppliers approved by Growthfund who provide goods or services in connection with [the third party]'s service provision to Growthfund under this agreement.

[The third party] shall take reasonable measures to ensure that its affiliated parties and subcontractors comply with the Code.

[X.4] [The third party] and its affiliated parties shall attend Growthfund's anti-corruption training, as may reasonably be required by Growthfund.

[X.5] During the term of this Agreement and for [one] year thereafter, [the third party] shall (i) properly and accurately record in its books and records (whether in physical or other form) all transactions in any way related to this Agreement or to services provided by [the third party] under it ("Transaction Records"), and (ii) provide copies of the Transaction Records and/or any other information as may reasonably be required by Growthfund upon written notice, in order to monitor [the third party]'s compliance with its obligations under clause [X]. [The third party] shall provide all reasonable assistance, including access to premises, documents (in physical or other form), and personnel, as may reasonably be required by Growthfund to carry out such an exercise.

[X.6] [The third party] declares that it is not in any legal or factual relationship or situation that places it in a potential conflict of interest or could otherwise raise suspicion that it is, to any extent, hindered from providing its services to the Company with the necessary efficiency and objectivity. In the event that, for any reason in the future, with or without the involvement of the third party, any legal or factual relationship or potential situation arises, the third party is obliged to immediately inform in writing Growthfund's competent corporate body and is further required to remedy the aforementioned situation as soon as it is requested to do so by the Company. The Company reserves the right, at its sole discretion, to determine whether a conflict of interest exists in relation to the third party, regardless of whether such a situation is described above or not.

- [X.7] [The third party] shall immediately inform Growthfund's competent corporate body of any development that may materially affect its ability either to effectively perform its services to the Company or to comply with applicable legislative provisions and regulatory requirements.
- [X.8] Without prejudice to the [Termination] clause, if Growthfund suspects that this clause [x] has been breached, it may terminate this Agreement without liability and with immediate effect upon written notice to [the third party].

ANNEX V - Supplier Code of Conduct

1. Purpose

Growthfund (Hellenic Corporation of Assets and Participations S.A.) (Growthfund or the Company) applies high standards of transparency and integrity across all aspects of its operations, including third parties contracted by the Company to provide goods and services - namely its Suppliers, as well as any person acting as their representative or subcontractor¹. The Company expects all parties to fully uphold the principles and values that govern its operations and to demonstrate professional and ethical conduct.

Growthfund's Supplier Code of Conduct (Code) contributes to fostering mutual understanding and alignment between the Company and its Suppliers regarding systematic responsiveness to business ethics matters and the integration of ESG and sustainable development principles into operational practices.

We work exclusively with Suppliers who share our commitment to integrity, sustainability, and respect for human rights, and who have agreed to meet the requirements set forth in this Code.

2. Human rights / fair working conditions

Suppliers of the Company are committed to fully respecting the rights of their employees, in accordance with international and national labor and human rights provisions. In this context, respect for privacy and individual rights must be ensured, along with the prohibition of all forms of discrimination (including, but not limited to, race, color, age, gender, sexual orientation, nationality, disability, religious or political beliefs, union membership, etc.), oppression or exploitation of workers, compliance with wage regulations and/or collective agreements, lawful working hours, prevention of child labor, and protection from violence and harassment in the workplace. Furthermore, it is essential to apply principles and values that promote fairness, equality, and just working conditions for all their employees.

This includes ensuring a decent level of remuneration and working conditions, as well as providing protection from any form of exploitation or mistreatment.

3. Health and safety at work

Suppliers of the Company are obligated to ensure a healthy and safe working environment for all their employees. This includes compliance with all applicable legal requirements concerning employee health and safety, as well as the implementation and adherence to safety procedures.

Suppliers must implement preventive measures to mitigate occupational risks and maintain a work environment that promotes health and safety. In this context, Suppliers must ensure that

¹ The term "Suppliers" refers to third parties, including individual contractors, with whom the Company collaborates for the supply of goods and/or services and/or works.

their employees have access to appropriate training and equipment necessary for the safe performance of their duties.

4. Environmental management

The protection and respect of the natural environment constitute a non-negotiable commitment for all. Suppliers of the Company are required to systematically seek ways to reduce its environmental footprint through recycling and the control of energy and natural resource consumption. They must demonstrate particular sensitivity to environmental protection issues and make every effort to conserve natural resources wherever possible.

Suppliers of the Company are expected to proactively align with the principles of responsible business conduct and ESG/sustainable development criteria, and to avoid situations that may result in adverse impacts. Furthermore, Growthfund, at its discretion, incorporates into its project award criteria related to sustainable development the requirement for documentation of the ESG standards and practices that Suppliers apply in their own business operations.

Suppliers of the Company are required to maintain high standards of environmental management across all their activities by complying with all applicable environmental laws and regulations, and by adopting practices that promote the sustainable use of natural resources and the reduction of emissions and waste.

Beyond compliance with legal requirements, Suppliers of the Company are encouraged to adopt a continuous improvement approach to environmental management, by adapting and enhancing their practices to reduce the environmental impact of their operations.

Suppliers of the Company are encouraged to implement environmental management programs, promote the use of sustainable materials and production processes, and invest in technologies that reduce the environmental footprint of their operations.

5. Business ethics

Suppliers of the Company must operate with integrity and transparency in all aspects of the business relationship and remain in full compliance with the applicable legal and regulatory framework for combating corruption and bribery, avoiding conflicts of interest, unfair competition, and preventing money laundering.

The Company requires all Suppliers to uphold the highest standards of ethical conduct, including compliance with all applicable anti-corruption laws. The Company does not tolerate or engage in any form of bribery or corruption, and does not permit any conduct that may give the appearance of such practices. Suppliers must avoid any activity that may lead to a conflict of interest, such as the personal use of information or the abuse of their authority for personal gain.

6. Confidentiality and protection of information and data

Suppliers of the Company are committed to protecting all confidential information provided in the context of our collaboration, complying with the legal framework for data protection and privacy, and ensuring the integrity and security of their information systems (cybersecurity). Suppliers must ensure that personal information and data of their customers and employees are collected, stored, and processed in accordance with applicable data protection laws.

7. Non-compliance – corrective measures

To ensure compliance with the Principles outlined in this Code, Suppliers are required to inform the Company in the event of non-compliance by themselves or any Subcontractor, and to provide documentation substantiating such non-compliance. This information should also include the corrective measures that have already been taken to restore compliance.

8. Commitment to compliance and reporting mechanisms

Suppliers commit to complying with the Code by allocating the necessary and appropriate resources and integrating all applicable policies and procedures.

In the event that the terms of this Code are not observed, or if there is suspicion that a party is not acting in accordance with the Code, you are encouraged to raise your concerns through the appropriate communication channels as outlined in the Company's Whistleblowing Policy.

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. For this purpose, the SAFEVOICE reporting platform has been created, which can be accessed through the following web address: <https://safevoice.growthfund.gr>. More information is included in the Company's relevant Whistleblowing Policy.