

ANTI-BRIBERY POLICY

Corruption hinders economic growth, as it can undermine fair competition and destroy trust in a company or an individual. At **B KARAOGLOU TAX ACCOUNT SA**, the fight against all forms of corruption is a priority, which is why the company decided to design and implement an Anti-Corruption Policy, in accordance with the requirements of the International Standard **ISO 37001:2016**. The Anti-Bribery Policy covers all the activities of the company regarding **Accounting and Tax Services** and was designed in accordance with the needs and aspirations of the Company and the Legal and Regulatory Requirements of the applicable Greek and Community Legislation.

Promoting a culture of ethics and integrity is a key factor in maintaining the trust of customers, stakeholders and society. The Company is committed to promoting a culture of integrity throughout its business and communicating its expectations for reducing the risk of corruption.

The general goal of the Company is to satisfy the needs and expectations of its customers as much as possible and to reduce the risk of corruption. It therefore establishes measurable targets for corruption in pursuit of:

- Improving the organizational structure, through the clear definition of powers and responsibilities.
- Compliance with laws and regulations related to its activity either directly (commercial activity) or indirectly (producers / suppliers).
- Improvement of Internal Communication, through the determination of the interaction and interdependence of the Company's processes.
- Continuous improvement of the Company's procedures and operation with the effective use of the following tools:
 - Define and review anti-corruption targets
 - Management Review
 - Internal Inspections
 - Corrective actions
 - Systematic data analysis.

The Company aims to prevent bribery and corruption through:

- prohibiting payment facilitation, even when permitted by law
- compliance with all anti-corruption and anti-bribery laws in force in each country where the company operates, as well as the same requirement from contractors
- compliance with all global policies aimed at preventing, directly or indirectly, a risk of corruption
- conducting due diligence investigation against risk-based bribery to third parties before engaging in the company's activities.

To promote a culture of ethics and integrity, as well as to comply with all applicable anti-corruption and anti-bribery laws and regulations, the company implements a comprehensive set of policies that set clear rules to be followed by all its employees and, where applicable, third parties. In addition, apart from the risk that the Company has to deal with, a corrupted employee may face personal civil and criminal penalties, including heavy fines and imprisonment. In addition to, it is forbidden to the employees of the Company:

- ❖ To promise, give or offer any item of value to any person in order to influence any action or decision, especially when interacting with government officials. This prohibition also applies to indirect corruption, i.e. actions carried out by third parties in the name or on behalf of the Company. Value items may include, but are not limited to: money, gifts, entertainment activities, hospitality and meals, travel expenses, services, employment offers, loans, donations or contributions, any transfer of value, even symbolic.
- ❖ To receive remuneration from a provider or client of the company
- ❖ To maintain a financial interest or relationship with a competitor, customer or provider of the Company, or another third party operating with the Company
- ❖ To participate in direct or indirect acquisition or possession, of any interests in the form of real estate or property of any kind for the purpose of selling or renting it to the Company

- ❖ To engage in any outdoor activity to such an extent that it raises questions about their ability to devote appropriate time and attention to their duties
- ❖ To interact with a relative who works for or has applied for a job with the Company, a competitor, provider or customer of the Company
- ❖ To purchase goods or services on behalf of the Company from a relative or a Company in which a relative has interests
- ❖ To receive valuable items. Accepting a gift may cause the recipient to feel obligated, possibly undermining the objectivity of their decisions, and may be perceived as a gift with the intention of corrupting the same or another employee of the Company.

The employees owe to the Company:

- ❖ To disclose any actual or potential conflict of interest before engaging in the transaction, activity or relationship leading up to the circumstance referred to.
- ❖ To disclose actual or potential conflicts of interest as part of the recruitment process.
- ❖ To disclose any real or potential conflict of interest annually, in the case of High Risk Exposure Officers, ie front line managers and all company employees who are regularly involved in contracting, purchasing, selling or renting services, materials, real estate or products.
- ❖ To abstain from the participation in the board of directors of any customer, provider or competitor of the company. Participation in external boards, apart from the professional duties of the Company's employees, is allowed, after approval, only for the members of the Executive Committee and should be limited to the provision of services that are consistent with their duties in the Company.
- ❖ To ask the Management about how to handle a conflict of interest, instead of relying solely on their interpretation, as well as their personal assessment.

Each employee is responsible for their own work and is required to contribute to the management against corruption and the achievement of the set goals. For this reason, all employees, depending on their responsibilities, are informed about the procedures against Bribery and Corruption and act in a proven manner in accordance with the established rules.

Any person (employee, customer, partner) is encouraged to raise anonymous concerns about any issue of bribery or suspected unfair practices at the earliest possible stage by contacting the company at angkar@karaoglou-sa.gr, or at 2310501019, or by mail at 30 Vakchou, P.O. Box 54629, 2nd floor, Thessaloniki, to the attention of the Complaints Committee.

Procedures, flows and actions, which do not guarantee the fulfillment of the set goals, are immediately stopped by those responsible, cause analyzes are carried out and the necessary improvement measures are defined.

This Anti-Bribery Policy is communicated to staff, is available to all interested parties and is reviewed on an annual base by the Company Management.

Thessaloniki, 01/09/2020

For **B KARAOGLOU TAX ACCOUNT SA**
Arapoglou Orestis

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