

ANTI-BRIBERY POLICY

GEFSINUS S.A.

GEFSINUS S.A. is committed to conducting all of its activities with integrity, transparency, professionalism and in full compliance with applicable legislation and the principles of business ethics.

The Company operates an Anti-Bribery Management System (ABMS) in accordance with ISO 37001:2025 and adopts a zero-tolerance policy towards any form of bribery, corruption, undue influence or other improper business practices.

This Policy applies at all levels of the Company and covers Management, employees, business partners, consultants, suppliers, subcontractors and any third party acting on behalf of GEFSINUS S.A.

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- Prevent, detect and address bribery risks through systematic risk assessments and appropriate controls.
- Apply risk-based Due Diligence procedures for suppliers, partners, customers and other interested parties.
- Provide the resources required for effective operation and continual improvement of the ABMS.
- Encourage the prompt reporting of actual or suspected bribery through established reporting channels.
- Protect any person who, in good faith and with reasonable grounds, reports a potential violation of this Policy or related procedures without fear of retaliation.
- Investigate promptly and objectively every report or suspicion of bribery and take appropriate corrective or disciplinary action where required.
- Implement appropriate financial and non-financial controls to ensure the integrity of business transactions.

The Management of GEFSINUS S.A. actively supports the Anti-Bribery Compliance Function (ABCF), ensuring its independence, authority and access to the resources required to perform its duties effectively.

Compliance with this Policy is mandatory for all employees and business partners. Any breach shall be examined under the applicable procedures and may result in disciplinary, contractual or other lawful actions.



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For GEFSINUS S.A.

Approval Date: 04/05 /2026

Ο ΔΙΕΥΘΥΝΩΝ ΣΥΜΒΟΥΛΟΣ

E. ΒΑΒΟΥΡΑΚΗΣ