

POLICY/STATEMENT AGAINST BRIBERY AND CORRUPTION

1. Introduction and purpose of this Policy

1.1. One of HC's Shared Values is that we always act lawfully, ethically, with integrity, and with respect for the community and the environment.

Bribery and the related conduct referred to in this Policy are not only serious criminal and civil offences (Law 4557/2018), but also contrary to our Shared Values. The demonstration of such conduct may result in very high fines, legal expenses and compliance costs, but also civil liabilities and imprisonment for individuals involved. It may also significantly damage HC's reputation and value in the marketplace.

1.2. This policy:

- i. sets out our responsibilities, and the responsibilities of those working on our behalf, in relation to bribery and corruption; and
- ii. provides information and guidance to those working on our behalf on how to recognize and deal with issues of bribery and corruption.
- iii. In this Policy, the terms "we", "us", "our", and "HC" refer to HELLENIC CATERING.

Please ensure that you read, understand and comply with this Policy.

2. To whom does this Policy apply?

2.1. This policy applies to all individuals working for or on behalf of us at all levels, including senior managers, executives, board members, employees (whether permanent, fixed term or temporary), consultants, contractors, interns, seconded personnel, casual employees and job agency staff, third party service providers, agents, contractors/sponsors or any other individual associated with us, wherever located (collectively referred to as the "Staff" in this Policy).

3. Our Policy: bribery, corruption and influence peddling

For the implementation of the current anti-corruption policy, our company maintains an Anti-Bribery Management System based upon the requirements of the International Standard ISO 37001:2016.

This policy defines the objectives of our fight against corruption, and encourages the development of trust without fear.

3.1. We conduct our business legally, ethically and with integrity. Corrupt practices are unacceptable and we take a zero-tolerance approach to

bribery, corruption and influence peddling. We are committed to conducting our business with professionalism, fairness, integrity and respect in all our business transactions and relationships wherever we operate, and to implementing and enforcing effective anti-bribery systems. We comply with the legal and regulatory framework in each country in which we operate.

3.2. We expect those doing business with us to adopt a similar zero-tolerance approach to bribery and corruption. Prior to entering into any agreement with any third party acting on behalf of HC, HC will conduct proper due diligence and obtain specific compliance assurances from such third party.

3.3. This Policy forms part of the Code of Conduct of the Vivartia Group of Companies to which HC belongs, as amended and supplemented from time to time.

3.4. The Administration and senior executives at all levels are responsible for implementing this Policy in their respective workplaces and ensuring that their subordinates are aware of and understand this Policy.

4. Responsibility for the Policy

4.1. This Policy has been approved by the Board of Directors of HC and endorsed by our Chief Executive Officer, to demonstrate HC's commitment to addressing issues of bribery and corruption.

4.2. HC has established an Anti-Bribery Compliance Team which meets on a regular basis and is responsible (as far as matters relating to bribery issues involving third parties are concerned) for monitoring the implementation of this Policy, overseeing compliance with this Policy more generally, providing training on the requirements of the Policy, and ensuring that it is adequately communicated to relevant parties.

4.3. HC's Anti-Bribery Compliance Team is responsible for monitoring compliance with this Policy and will report directly to the Board of Directors of HC on monitoring activities.

4.4. In addition, HC has appointed a Reporting Receipt and Monitoring Officer (RPMO) in compliance with Law 4990/2022, for matters concerning EU legislation, part of which also touches on issues of bribery and corruption involving company employees.

5. Bribery, corruption, influence peddling and other forms of unethical behavior

5.1. Bribery includes the following:

- i. Whenever a financial or other advantage is offered or promised to another person, with the intention of enticing or rewarding them to perform their duties improperly; or
- ii. whenever a financial or other advantage is required, agreed to be received, or accepted by another person, in order to perform their duties improperly.

It is immaterial whether the bribe is given directly or through a third party or is given for the benefit of the recipient or another person, whether it is effected through an inducement or reward offered, promised or given, directly or indirectly, to a public official (employee of a government agency or a government-controlled entity) or to a participant in a private commercial transaction, for the purpose of obtaining any commercial, contractual, regulatory, or personal advantage through improper performance of a relevant function or activity.

5.2. Examples of bribery include the following:

- 5.2.1.** Offering a bribe: You offer tickets to a prospective customer for a major event, on the condition that they agree to do business with us, preferring us over a competitor or reducing their prices. This would be an offence, because you are making the offer in order to gain a commercial or contractual advantage. It may also be an offence for the prospective customer to accept your offer.
- 5.2.2.** Accepting a bribe: A supplier offers a job position to a relative of yours, making it clear that in return, they expect you to use your influence in our organization to ensure that we continue to do business with them. Such an offer is an offence for a supplier. It would be an offence to agree with him, because doing so would give you a personal advantage.
- 5.2.3.** Bribery of a public official (national or foreign): You make a payment or arrange for HC to make a payment to a public official, in order to ensure that the agency in which they work issues a favorable inspection report or issues a license that HC needs for its business. The offence of bribing a public official will be committed once the offer is made. This is due to the fact that it is done in order to secure a business advantage for HC.

5.3. Apart from direct monetary payments or the offering of expensive gifts, other examples of bribery could include the following, offered through instructions/orders or for the benefit of a public official or a commercial business partner/associate: (a) travel, meals, entertainment or other high-value hospitality; (b) contributions to any political party or (official) campaign; or (c) charitable contributions or corporate sponsorships. It is also prohibited to offer, promise or indirectly provide a bribe through

business partners, service providers, consultants, or other agents working on behalf of HC, including through secret kickbacks.

5.4. Corruption is the abuse of a public or private office for personal gain.

5.5. Influence peddling is a form of corruption. This is the act of using one's *influence* in government or connections with persons in positions of power to obtain favors or preferential treatment for someone else, usually (but not exclusively) for a fee.

5.6. Avoiding Conflicts of Interest

HC personnel may find themselves in a position where they would be likely to violate anti-bribery or anti-corruption laws if a conflict of interest exists, particularly with respect to contracts. Such conflicts arise when your personal interests conflict with HC's interests.

Examples of areas where a conflict of interest may arise include a personal interest in a contract, either directly (for example, if you are the counterparty to a contract) or indirectly (for example, if you have a counterparty interest in the contract through share ownership or if a close relative works for or has a proprietary interest through the counterparty and will benefit, directly or indirectly, from the contract), employment outside of HC, the use of HC's confidential information in a personal transaction, or the solicitation or acceptance of gifts or entertainment.

Consequently, you should not engage in activities that involve or could be perceived to involve a conflict of interest. If you determine that HC is considering doing business with an entity or person with whom you have a personal or financial relationship, you should remove yourself from the decision making prHCedure or oversight of operations, and disclose your relationship to your supervisor and/or the company's designated RPMO. If you are unsure whether a particular situation may result in a conflict of interest, contact your supervisor and/or the company's designated RPMO.

5.7. Gifts and hospitality.

5.7.1. This Policy does not prohibit reasonable, sensible and fair hospitality (whether offered or accepted) to or from third parties, if its purpose is to enhance HC's image, showcase our products and services, or establish or maintain business relationships. Therefore, our personnel is permitted to offer or receive gifts or hospitality at a level that is reasonable, proportionate, justified and consistent with this Policy and with any applicable gift and/or hospitality policies or legislation.

5.7.2. It is prohibited to offer any gift or hospitality with the expectation of securing a business advantage or providing a business advantage. It is not permitted for our personnel to solicit gifts. Gifts are permitted only if they are provided on a non-regular basis, for the sole purpose

of cultivating or enhancing a business relationship, and within the defined limits applicable within the Company's approved internal procedures.

5.7.3. However, hospitality or gifts must not be offered or accepted by customers or suppliers, regardless of their value, in periods leading up to and during a tender or negotiation process for a contract involving that customer or supplier. If staff is unsure whether they are in a time period leading up to a competitive bidding process, they should contact the RPMO.

5.8. HC fully and actively complies with all laws and regulations relating to "Money Laundering" and Terrorism and acknowledges that it has a responsibility to report any conduct deemed suspicious to the relevant Greek Authorities.

5.9. Political donations: We do not make donations to political parties, organizations or individuals involved in politics.

5.10. Facilitation payments: A facilitation payment is a payment to a public official to secure or expedite an ordinary, restrictive governmental action by that official. This type of payment is typically solicited for by lower-level public officials in exchange for the provision of a service which, usually and customarily, is performed by the official. At HC, we do not make facilitation payments, with the exception of statutory and legal expediting fees, such as payments for expediting a passport applications or processing government documents such as entry visas.

5.11. If there is an imminent threat to your health or safety, you may offer payment to prevent immediate harm. Possible loss of business activity by HC does not constitute an imminent threat. Whenever possible, you should first consult with and obtain approval from the RPMO before making a payment. If prior approval cannot be obtained, you must report the payment to the RPMO within 48 hours of making the payment.

6. Actions to be taken if a case of bribery or corruption comes to your attention

6.1. Preventing, detecting and reporting bribery and other forms of corruption is the responsibility of everyone who works for us or under our control. All staff must avoid any activity that could lead to a breach of this Policy, whether by staff or by business partners, service providers, consultants or other agents of HC.

6.1.1. If a complaint is found to be malicious and the person concerned requests so, such person may be informed of the identity of the complainant in order to exercise his or her legal rights. Complaints that are proven to be patently malicious will be further investigated

at the company's discretion, both as to the motives and the parties involved, in order to restore order by all lawful means and methods.

6.1.2. Complaint Channels: The channels through which complaints are made, whether named or anonymously, shall include the means by which complaints are made and the persons to whom complainants may address themselves. More specifically:

- To the e-mail address whistleblower@vivartiafs.com through which the RPMO receives allegations of bribery involving company personnel.
- To the e-mail address estiasisethics@vivartiafs.com through which authorized company officials (Evaluation & Reporting Committee) also receive allegations of bribery involving third parties. The information is forwarded to the Anti-Bribery Compliance Team by the members of the Committee, and the RPMO is also informed.
- Complaint boxes: placed in secure locations in all company buildings and premises for free access. Complaints (by company staff) are collected on a regular basis, with a maximum interval of 15 days, by an authorized employee of the Human Resources Department (who also holds the keys to the boxes). The closed envelopes are collected and delivered to the HR Director for safekeeping. The Report Evaluation & Distribution Committee is immediately convened, where the envelopes are opened in the presence of all members, after which the Committee takes action. Where appropriate (depending on the content), complaint shall be forwarded to the relevant officers for their own actions (Anti-Violence & Harassment Committee, RPMO, Anti-Bribery Compliance Team)
- By mail: to the address "D.A.A., El. Venizelos-Building 14B, Spata Attica, P.O. Box 19019, CONFIDENTIAL, to the attention of the Director of Human Resources", acting as above.
- By telephone or by physical presence at the RPMO, or at the Compliance Team, depending on whether the complaint concerns an internal employee or a third party.

6.2. We strongly encourage you to report any issues of concern about any issue or suspected abuse or breach of this Policy at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or

corruption, or if you have any other questions, you should discuss them with the RPMO or the Anti-Bribery Compliance Team.

6.3. It is important that you inform the RPMO or the Anti-Bribery Compliance Team as soon as possible if you are offered a bribe by a third party, if you have been asked to offer a bribe yourself, if you suspect that this may happen in the future, or if you believe that you may be the victim of other forms of illegal activity.

6.4. The company protects both individuals making complaints and individuals who are included in complaints. Investigations are carried out with utter discretion and respecting confidentiality at every stage of the process to the maximum extent possible, in order to avoid stigmatization and 'victimization' of individuals. The RPMO, the Compliance Team as well as the Company's Administration ensure that there will be no retaliation in the event that anyone in good faith reports an incident of bribery or corruption.

6.5. For the purposes of this Policy, retaliation or detrimental treatment includes dismissal, disciplinary sanctions, threats, or other adverse treatment associated with reporting an issue. If you believe that you have been treated any such way, you should immediately inform the RPMO.

7. Training and communication

7.1. Training on this policy should be part of the initial training process for all new Staff. Staff members who may be more likely to be exposed to bribery because of their role and position will receive appropriate training on how to implement and comply with this Policy.

7.2. Our zero-tolerance approach to bribery and corruption will be communicated to our suppliers, contractors and business partners at the start of our business relationship with them and thereafter as appropriate.

8. Monitoring and control

8.1. The Anti-Bribery Compliance Team will monitor the effectiveness and review the implementation of this Policy, regularly reviewing its suitability, adequacy and effectiveness. Internal control systems and procedures will be subject to regular audits, in order to ensure that they are effective in combating bribery and corruption.

8.2. All Staff are responsible for the success of this Policy and should ensure that they use it to disclose any suspected breach or improper activity.

9. Objectives

HELLENIC CATERING's objectives in relation to bribery and corruption include raising our suppliers' awareness through training programs and by providing support material. They also include maintaining zero incidents of bribery and corruption by 2030. HELLENIC CATERING follows the Supplier Code of Conduct of the GOODY'S | everest Group, incorporating key elements such as anti-corruption and anti-bribery. In addition, we aim to train 100% of our Staff in matters concerning anti-bribery and corruption by 2030. Through these actions, the Group is committed to acting in accordance with the Code of Business Conduct of the Vivartia Group and to following legal and ethical practices as defined by national and international legislation.

In addition, the company aims to ensure that its business activities are conducted legally, ethically and with integrity, adopting a zero-tolerance approach to bribery, corruption and influence peddling, and conducting itself professionally and impartially in all business transactions and relationships. The company also aims to comply with the legal and regulatory framework in all countries where it operates and to promote trust without fear.

HELLENIC CATERING wishes to strengthen its efforts to operate transparently and to maintain high standards of ethics and conduct in all its business activities. We aim to improve interdepartmental communication to ensure consistent application of regulations by developing best practices and communication channels through which both suppliers and Staff can report incidents of corruption and bribery, anonymously or not.

For HELLENIC CATERING

The President and CEO