



VITAE L INVESTMENT - DEVELOPMENT S.A.

ANTI-BRIBERY POLICY

Since its foundation and throughout its operation, VITAE L S.A. has recognized the issue that exists worldwide in terms of bribery and corruption, undermining economic and social development and adversely affecting free competition.

The company's goal is to combat bribery and corruption at all levels by pursuing integrity and transparency in every aspect of its operation.

Through this Anti-Bribery Policy (hereinafter "the Policy") and given the importance of fighting corruption and bribery, VITAE L S.A. (hereinafter "VITAE L") aims to demonstrate its non-negotiable will and commitment for zero tolerance to such phenomena and practices.

The Policy covers, without limitation, the Management and the members of VITAE L regardless of position, including the members of the Board of Directors. It also covers VITAE L employees regardless of their contractual scope, service providers with project, independent services and salaried mandate contracts, those employed through third party service providers, interns and apprentices, employees whose employment relationship has ended, the people who apply for work and workers in the informal economy and in general every person who trades or cooperates in any way with the company.

Compliance with the applicable legal and regulatory framework to combat corruption and bribery is everyone's responsibility. We shall not tolerate any form of corruption or bribery nor behaviors, acts or omissions that could expose VITAE L to risk or even cause the mere suspicion of corruption or bribery. The behavior in question is illegal, non-contractual and, beyond its legal consequences, it will result without exception in the termination of the employment relationship or cooperation with VITAE L. Within this context, VITAE L hereby declares that it categorically opposes any form of corruption and bribery and demonstrates zero tolerance for such phenomena.

With this Policy and in order to achieve the intended goal, VITAEL establishes the following basic guidelines:

- I. The company completely prohibits any form of bribery and/or its acceptance.
- II. The company applies all the provisions and rules of Greek and EU Law regarding bribery, seeking the compliance of all persons covered by this Policy in a nonnegotiable manner.
- III. The company makes every effort to combat corruption by implementing appropriate measures and providing the necessary resources.
- IV. The company encourages and urges its executives, employees and partners to immediately disclose and report any possible bribery and suspicion of such behavior, prohibiting the punishment or negative treatment of these persons through the Reporting Policy it has established.
- V. The company informs and trains appropriately and continuously its executives, employees and partners with the aim of raising awareness for combating and reporting incidents of bribery.
- VI. The company imposes sanctions in case of violation of the relevant provisions and makes a report to the competent authorities (including criminal prosecution).
- VII. The company ensures the investigation of every possible case of bribery, through a specific structure, independent of its staff that reports to the CEO of VITAEL and examines and assesses the risks of bribery ensuring the confidentiality of the report and implementing relevant measures to combat such phenomena.
- VIII. The company continuously assesses the risks related to anti-bribery issues that may arise in the course of its business activities.

- IX. The company undertakes to update this Anti-Bribery Policy as and when necessary for the continuous improvement of the anti-bribery system it applies.

The Policy will be communicated to all VITAEAL staff and it is accessible to all interested parties through the company's official website.