	<p style="text-align: center;"><b>ANTI – BRIBERY POLICY</b> <b>PL 10.24</b></p>	<p style="text-align: right;">EDITION:2ND VALID FROM: 01/10/2021</p>
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The company **THALIS E.S. S.A.**, with a strategic orientation to its development both in Greece and abroad, is committed to the creation, implementation, maintenance, and continuous improvement of the Anti-Bribery Management System it implements in accordance with ISO 37001:2016.

The company is committed to high standards of ethical behavior and requires all its directors, senior executives, employees, business partners, and other stakeholders with whom it works to comply with this policy without exception.

All employees, including Management, have been trained in relation to this policy.

The company:


- makes bribery illegal. Any involvement in bribery, corruption, facilitation payments, or any other illegal act will result in the termination of the business relationship.
- does not work with companies that engage in corrupt practices and immediately terminates all relationships with clients or other interested parties if such cases arise.
- complies with anti-bribery legislation that applies to the company and requires compliance by all stakeholders.
- sets goals for the fight against bribery, which are reviewed annually in terms of their degree of implementation; new ones are approved or older ones are modified depending on the company's performance and new conditions, such as new projects, in its field of action
- is committed to meeting the requirements of the Management System and its continuous improvement.
- encourages the confidential reporting of suspicions in good faith or on the basis of reasonable belief, without fear of retaliation.

When partners or other interested parties represent our company, they should, as part of their contractual obligations, agree to follow this policy. All their fees and expenses must be legal, reasonable, justified, and supported by evidence. Where legal and other commercial relationships may deviate in certain countries from this policy, the CEO will decide on the due diligence arrangements that should be made prior to entering any business relationship. However, without exception, the company does not engage in offering or accepting bribes. The company will not knowingly engage in any transaction where corrupt practices are part of the deal.

Conflicts of interest are not acceptable. It is a condition of employment that Management and employees do not conduct private business, political or philanthropic actions within the company without the prior written consent of the CEO.

All contractors, and other interested parties must declare to our company, before representing it in any way, if they have any actual or potential conflict of interest with a particular client or other interested party or have been involved in Bribery situations.

The company does not make political contributions. In the case of a charitable donation, the written consent of the CEO is necessary.

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The company only permits the receiving and giving of small-value gifts and hospitality where this is reasonable and proportionate to a business relationship. Gifts and hospitality are avoided if there is a risk that they may be perceived as influencing decision-making.

Managers, staff, and contractors use confidential reporting channels to raise concerns or complaints. However, all members of management are informed of how to deal with concerns brought to their attention, and it is a serious disciplinary matter to fail to report and investigate such concerns. Under no circumstances will there be any form of retaliation due to the use of the complaint channel.

ISO 37001:2016 Anti-Bribery System has been put in place to prevent the company from engaging in any corrupt process and to process and report on cases in which further investigation and action may be required. This is fully supported by senior management.

Senior Management is regularly informed of all Anti-Bribery System matters and the policies and procedures supporting this System are reviewed at least annually.

Senior Management defines the competence and independence of the Head of the Management System and the Compliance and Investigation of Bribery Matters Committee and is committed to and supports the implementation of the Anti-Bribery System in accordance with this policy and the defined objectives, so as to adequately mitigate the risk of bribery for **THALIS E.S. S.A**

The Bribery Compliance and Investigation Committee is responsible for answering any questions and clarifying any bribery issues. The Bribery Compliance and Investigation Committee promotes the resolution of any issues arising from these communications. This policy is communicated internally and externally, ensuring that customers, business partners, stakeholders and employees are informed of the Company's commitment to anti-bribery.

DIRECTION  
01/10/2021