

QUALITY MANUAL

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KALLIFRONAS S.A.

Anti-bribery policy



KALLIFRONAS S.A., which recognizes the importance of combating corruption and bribery, as well as the negative impact that any involvement in bribery could have on its image and reputation, has established and implements an Anti-Bribery Policy, approved by the company's manager. The Policy is binding on all employees without exception, regardless of functional position and hierarchical level, including the manager, subcontractors, suppliers, consultants of all kinds, business partners and any other third party acting on behalf of the company.

This Policy aims to raise awareness among all employees and associates of the company against the phenomenon of bribery and seeks to strengthen the Management's commitment to zero tolerance for bribery, creating a framework of obligations and guidelines to be used as a tool for preventing, deterring and combating bribery.

Specifically, the Policy

- Prohibits bribery within and outside the Organization.
 - Aims to comply with the applicable legal and regulatory framework for combating bribery.
 - is appropriate for the purpose and activity of the company.
 - Provides a framework for setting, reviewing and achieving anti-bribery objectives.
 - Encourages the confidential reporting of any incident or suspicion of bribery, through specific communication channels and the vigilance of employees and partners to identify actions related to bribery, based on trust, without fear of retaliation.
 - Meets the requirements of the Anti-Bribery Management System according to the ISO 37001/2016 standard and aims to continuously improve the Anti-Bribery Management System.
 - Defines the responsibilities and implements the principle of independence of the anti-bribery compliance committee.
 - Non-compliance with the Anti-Bribery Policy and its non-acceptance by anyone, including subcontractors, suppliers, consultants, all types of business partners and any other third party acting on behalf of the company, results in the immediate cessation, interruption or non-initiation of any collaboration.
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- All interested parties may contact the company to report any illegal and questionable business activities that potentially involve KALLIFRONAS S.A. via e-mail at compliance@mkal.gr.

On behalf of the Administration
KALLIFRONAS S.A.