

QUALITY MANUAL

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KALLIFRONAS S.A.

Anti-Bribery Policy



KALLIFRONAS S.A., recognizing the importance of combating corruption and bribery, but also the negative effect that any involvement in bribery could have on its image and reputation, has established and applies an Anti-Bribery Policy approved by the company's administrator.

The Policy is binding on all employees without exception, regardless of functional positions and hierarchical rank, including the manager, subcontractors, suppliers, consultants of all kinds of 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 of bribery, creating a framework of obligations and guidelines to be used as a tool for preventing, deterring and combating bribery.

In particular, the Policy:

- Prohibits bribery inside and outside the Agency.
- It aims to comply with the current legal and regulatory framework for combating bribery.
- It is suitable for the purpose and activity of the company.
- It provides a framework for setting, reviewing and achieving anti-bribery objectives.
- It encourages the confidential reporting of any incident or suspicion of bribery, through the specific means of communication and the vigilance of employees and associates, to identify actions related to bribery on the basis of trust, without fear of retaliation.
- Meets the requirements of the Anti-Bribery Management System according to **ISO 37001/2025** and aims at the continuous improvement of the Anti-Bribery Management System.
- Defines the responsibilities & implements the principle of independence of the Anti-Bribery Compliance Committee.
- Non-compliance with and non-acceptance of the Anti-Bribery Policy by anyone, including subcontractors, suppliers, consultants, business partners of any kind and any other third party acting on behalf of the company, results in the immediate cessation, termination or non-commencement of any cooperation.

Interested parties may contact the company to report any illegal and dubious business activities potentially involving **KALLIFRONAS S.A.** in the following ways:

- via e-mail to compliance@mkal.gr
- via named or anonymous correspondence to the company's address, **7, P.P. Germanou Str., 10561, Athens, Greece**, to the attention of the **Anti-Bribery System Officer**.

From the Administration
KALLIFRONAS S.A.

Issued by:
Signature:
Date:

Politi N.

16/02/2026

Approved by:
Signature:
Date:

Kallifronas A.

16/02/2026