



VANOS SA Anti-Bribery /Anti- Corruption Policy

Bribery/accepting bribery and corruption are major threats to good administration, sustainable development, business ethics and trusted faith among business partners. They undermine efforts to achieve economic growth.

The company VANOS S.A. (hereinafter the "Company") operates with zero tolerance for incidents of bribery/accepting bribery and corruption. The Company acts with business ethics and integrity in mind. The management of VANOS S.A. undertakes to contribute in any way it can to the prevention and combating of bribery/accepting bribery and corruption. It also wishes to ensure that all of its partners apply the best practices.

Corruption can be defined as abuse of delegated power for personal gain. Benefits can be monetary and/or non-monetary. It can take many forms. Detecting such incidents is therefore not always easy. Everyone's help to combat such phenomena is necessary.

This policy is not intended to prohibit hosting and/or entertainment practices that are proportionate, properly registered and legal in the jurisdiction in which they take place. Practices aimed at creating and/or strengthening relationships and promoting the purposes of VANOS S.A. they must be carried out transparently and not create any expectation for the recipient to reciprocate, either by performing or omitting actions, any other action in return.

It should be noted that VANOS S.A. does NOT distinguish between facilitation payments and bribery. Both are expressly prohibited, even if a payment is small or even acceptable according to local customs and traditions. The term facilitation payment usually refers to situations where a small sum of money is offered to an employee to secure or expedite the performance of a routine or necessary action to which the person making the payment is legally entitled.

In VANOS S.A. we are committed to complying with all the requirements of the ISO 37001:2016 standard and to the continuous improvement of the Anti-Corruption Management System, as well as to compliance with the requirements of domestic and foreign legislation, as indicatively mentioned the Greek Penal Code, and the supranational laws and regulations, as also indicative is the "Convention on the fight against bribery involving officials of the European Communities or the member states of the European Union, drawn up pursuant to Article K.3 paragraph 2 point c) of the treaty on European Union", the UK BRIBERY ACT 2010 and the US Foreign Corrupt Practices Act. (FCPA).

VANOS S.A. does NOT make donations to political parties.



Every member of VANOS S.A., its employee and partners must oppose bribery/accepting bribery and corruption and inform the management of suspicious incidents related to such phenomena.

Our partners and third parties can honestly report, without this should be entailed adverse consequences for them, incidents of bribery/accepting bribery and corruption related to the action of VANOS S.A. in its administration. The purpose of the Company is to enhance transparency and for this reason the management will investigate all reports. Reports must be made honestly and in good faith under this policy regarding suspicious incidents, even if those suspicions ultimately prove to be false. The Company reserves the right to take legal action, claiming any positive and collateral damage and moral harm that may be caused to it, due to fraudulent, false and fraudulent reporting of "incidents" of bribery/bribery and corruption.

Piraeus 01/03/2024

Aikaterini D. Vanou

President/ CEO