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## ANTI-BRIBERY POLICY

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### 1. Introduction

Corruption hinders economic growth as it can undermine fair competition and erode trust in a company or an individual. At GENOTYPOS S.A., combating all forms of corruption is a priority.

Promoting a culture of ethics and integrity is a key factor in maintaining the trust of customers, stakeholders, and society. GENOTYPOS S.A. is committed to fostering a culture of integrity throughout its operations and communicating its expectations for reducing the risk of corruption.

### 2. Purpose

The general objective of GENOTYPOS S.A. is to meet the needs and expectations of its customers to the greatest extent possible while reducing the risk of corruption. To this end, it establishes measurable goals for combating corruption, aiming to:

- Improve the organizational structure through the clear definition of authorities and responsibilities.
- Comply with legislative and regulatory provisions related to its activities, whether directly (service provision activities) or indirectly (manufacturers/suppliers).
- Enhance internal communication by identifying the interactions and interdependencies of GENOTYPOS S.A.'s processes.

### 3. Prevention of Bribery & Corruption

GENOTYPOS S.A. aims to prevent bribery and corruption through:

- The prohibition of facilitation payments, even when allowed by law.
- Compliance with all anti-bribery and anti-corruption laws applicable in the country where the company operates, as well as requiring the same from contractors.
- Adherence to all global policies aimed at preventing, directly or indirectly, the risk of corruption.
- Conducting risk-based due diligence against bribery for third parties before engaging them in the company's activities.

To promote a culture of ethics and integrity, and to comply with all applicable anti-corruption and anti-bribery laws and regulations, GENOTYPOS S.A. implements a comprehensive set of policies and standards that establish clear rules which all employees and, where applicable, third parties must follow. Beyond putting the company at risk, corrupt employees may face personal civil and criminal penalties, including heavy fines and imprisonment.

Additionally:

#### 4. Restrictions

**GENOTYPOS S.A. employees are prohibited from:**

- ❖ Giving, promising to give, or offering any item of value to any person with the intent to influence any action or decision, especially when interacting with government officials. This prohibition also applies to indirect corruption, i.e., actions performed by third parties on behalf of the company. Items of value may include, but are not limited to: money, gifts, entertainment, hospitality and meals, travel expenses, services, employment offers, loans, donations or contributions, any transfer of value, even if symbolic.
- ❖ Receiving compensation from a provider or customer of GENOTYPOS S.A.
- ❖ Maintaining a financial interest or relationship with a competitor, customer, or provider of GENOTYPOS S.A., or any other third party doing business with GENOTYPOS S.A.
- ❖ Engaging in direct or indirect acquisition or possession of any interests in the form of real estate or assets of any kind with the intention of selling or leasing them to GENOTYPOS S.A.
- ❖ Participating in any external activity to such an extent that it raises questions about their ability to devote appropriate time and attention to their duties.
- ❖ Interacting with a relative who works for or has applied for a job at GENOTYPOS S.A., a competitor, provider, or customer of the company.
- ❖ Making purchases of goods or services on behalf of the company from a relative or a company in which a relative has interests.
- ❖ Receiving items of value. Accepting a gift may create a sense of obligation in the recipient, potentially undermining the objectivity of their decisions and may be perceived as a gift intended to corrupt them or another employee of **GENOTYPOS S.A.**

#### 5. Obligations

**At GENOTYPOS S.A., employees must:**

- ❖ Disclose any actual or potential conflict of interest before engaging in the transaction, activity, or relationship that leads to the stated circumstance.
- ❖ Disclose actual or potential conflicts of interest as part of the hiring process.
- ❖ Annually disclose any actual or potential conflicts of interest if they belong to High-Risk Exposure Employees, which includes first-line managers and all employees of GENOTYPOS S.A. who are

regularly involved in contract creation, purchasing, selling, or renting services, materials, real estate, or products.

- ❖ Refrain from participating on the board of directors of any customer, provider, or competitor of GENOTYPOS S.A. Participation in external boards, outside the professional duties of GENOTYPOS S.A. employees, is permitted, upon approval, only for members of the Executive Committee and must be limited to providing services consistent with their duties at GENOTYPOS S.A.
- ❖ Consult the respective Department Head or System Officer on how to handle a conflict of interest, rather than relying solely on their interpretation and personal judgment.
- ❖ Every employee is responsible for their work and must contribute to anti-bribery management and achieving set goals. Therefore, all employees, depending on their responsibilities, are informed about the Anti-Bribery Management System and act demonstrably according to the established rules.

Any person (employee, customer, partner) is encouraged to raise concerns anonymously about any bribery issue or suspicion of unfair practices as early as possible by contacting GENOTYPOS S.A. at 0030 210.77.70.870 & 0030 698 657 1842, via email at [genotypos@genotypos.gr](mailto:genotypos@genotypos.gr), or by mail to Ilision 3a-5, 11528 Athens, in the attention of the Complaints Committee.

Procedures, flows, and actions that do not ensure the fulfillment of set objectives are immediately interrupted by those responsible, root cause analyses are conducted, and required improvement measures are determined.

This Anti-Bribery Policy is communicated to the staff, made available to all interested parties, and periodically reviewed by the Management of GENOTYPOS S.A.

Athens, 28.03.2024

For GENOTYPOS S.A.

[Revision Table](#)

Version Number	Effective Date	Reason / Description of Change
01	28/03/2024	Initial Version