ANTI-BRIBERY POLICY

2nd Edition– October 2023

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1. INTRODUCTION

1.1 Goal

This Anti-Bribery Policy for MEDICON HELLAS SA defines the corresponding principles, rules and the manner in which they must be applied. The Policy prohibits bribery and donation and it requires compliance by everyone involved in any way with the Company's interests or activities with anti-bribery legislation, is appropriate to the Company's purposes, provides the framework for the determination, the review, and the achievement of anti-bribery objectives, commits the Company to the universal implementation of a comprehensive and continuously improved anti-bribery system.

The Policy also encourages the reporting of cases, or potential cases, to the Company based on good faith, confidentiality and assurance of non-retaliation, while also explaining the consequences of non-compliance with this policy.

Finally, this policy defines the competence and independence of the Company's Quality and Compliance Department as the person in charge of the bribery management system.

1.2 Scope

This Policy applies to all shareholders, Executives, employees, internal and external partners, suppliers as well as the organizations controlled by the Company, i.e. the organizations in which it directly or indirectly controls their Management (e.g. subsidiary companies Group).

Exceptionally, subject to specific applicable frameworks of special application, related to the commercial and scientific object of each subsidiary company, possible necessary adjustments to the Policy may be made.

The Anti-Bribery Policy has been designed in such a way as to address a wide range of the Company's business operations in which issues of bribery may arise. Other aspects of business ethics and corruption such as the exchange of confidential information within and outside the Company are regulated separately.

This Policy comes into force from 23.10.2023 and must be applied by all involved and interested parties of the Company.

1.3 Definitions

Bribery is the offer, promise, acceptance or solicitation of an undue benefit of any value (financial or non-financial), direct or indirect and regardless of jurisdiction, in violation of applicable law, as an inducement or reward for a person to act or omit to act in relation to exercise or the measurable results regarding his duties. Bribery also includes donation.

Gifts are, benefits of any kind given to someone according to the rules of etiquette or for reasons of politeness and courtesy, appreciation or friendship without the expectation of receiving anything in return. They include "custom gifts", which are small gifts given on culturally recognized occasions (e.g. weddings, funerals) or at special times of the year (e.g. Christmas, New Year's) or as part of an offering due to their

institutional status of the recipient according to the rules of etiquette or for reasons of modesty and politeness.

Hospitality includes general tickets (airline, public transport), refreshments, fuel, meals and accommodation.

Entertainment generally includes attending shows, concerts and sporting events.

Public Official is the person who holds a legislative, administrative or judicial office either by appointment, election or succession or any person exercising a public function, including public authorities or public organizations or any employee or representative of a public, domestic or international organization or a candidate for public office (ELOT ISO 37001:2017). The term "public official" has been broadly interpreted by the regulatory authorities and includes the following:

- Any elected or appointed officer or employee of a government or government agency, government agency or corporation owned or partially owned by a government
- Any elected or appointed officer or employee of public international organizations, such as the United Nations
- Any person acting in an official capacity for or on behalf of a government or government agency, government agency or public international organization
- Politicians and candidates for political office
- Any other person considered a public official according to applicable laws, regulations
- Entities exercising a legislative or executive function, their members or employees, whether acting individually or collectively **(Institutional Entities).**

Interest representative: the natural or legal person, who exercises influence activity for a fee, through his communication with the institutional bodies, on behalf and for the benefit of his client. Excluded from the definition are persons connected to the client through an employment relationship or salaried mandate.

"Communication": any oral, written or electronic contact of an interest representative on his own initiative with the institutional bodies aimed at exerting influence.

Political contributions are monetary or non-monetary (e.g. resources, facilities) contributions to support political parties, policies or political initiatives.

"Lobbying" Influence Activity: It is any type of direct communication of an interest representative with institutional bodies, which aims to influence the decision-making process, and in particular, with regard to the content of a law, presidential decree, ministerial decision, other regulatory administrative act or circular and which is carried out for a fee, in the context of representing the client's interests, regardless of whether the process is ongoing, or following the communication, and regardless of the outcome of the communication.

The above definition does not include communication that takes place in the context of:

- an invitation from its institutional bodies to provide information during the decision-making process,

- legal or other type of professional representation aimed at exercising rights, such as in particular the rights of information, hearing and appeal in any procedure,
- collective negotiations with members of trade unions, as provided by labor legislation, if they act in this capacity,
- discussion with members of a diplomatic mission or consular authority, or with representatives of member states of the European Union, or third countries, or with representatives of the European Union, or other European and international organizations, as long as they are acting in their official capacity.

Facilitation payments are payments to public servants to expedite the performance of non-discretionary duties. These payments are intended to affect only the timing of the actions of civil servants (e.g. payments to expedite the issuance of visas or the clearance of goods through customs), but not their outcome.

A third party is any natural or legal person with whom the Company interacts and poses, due to the nature of their business, a certain level of risk of bribery. The Company's subsidiaries and affiliates are not considered third parties in this policy.

Due Diligence is the process of further evaluating the nature and extent of bribery risk and assisting the Company in making decisions with respect to specific transactions, projects, activities, associates and personnel.

New Business Activity means any transaction involving the acquisition or acquisition of all or part of a third party or Company or the merger of the Company with another company or Company.

Joint Venture means any type of joint agreement or arrangement between the Company and one or more third parties to own and operate a Company as a separate Company for the mutual benefit of the Company and the third party or parties.

The terms **books** and **records** include accounts, invoices, correspondence, documents, CDs, tapes, memorandums of understanding and agreements as well as any other document or transcribed information of any type.

2. BASIC RULES AND PRINCIPLES

2.1 Basic rules

Partners must not bribe and must not use intermediaries such as agents, consultants, distributors or other business partners to commit acts of bribery (passive and active).

The Company makes no distinction between public officials and private individuals with regard to bribery: bribery is not tolerated, regardless of the status of the recipient or offerer.

The person involved on behalf of the Company should consider before offering, giving or promising anything regardless of financial or moral value to any person whether what he will do can be considered an illegal act of bribery or give rise to the suspicion of bribery. If so, it is forbidden to proceed with this action. In any case,

in any doubt, before continuing, the legal advisor or the person in charge of the Company's Quality and Compliance Department will be consulted immediately.

Bribery can take many forms - offering or giving money, benefits or anything else of value. In fact, even what may be generally accepted as appropriate business practices or social activities, such as giving gifts and hospitality, can constitute bribery in certain cases and under certain conditions.

Cases in which Management, employees or anyone acting in any capacity on behalf of the Company and receiving, agreeing to receive, requesting or accepting a benefit (financial or anything else of value) are regulated through anti-bribery system procedures.

2.2 Gifts, hospitality and entertainment

The provision of gifts, hospitality and entertainment will be governed by modest proportionality and will not be made at regular intervals for any recipient.

In no case will the offer of the above (gifts, hospitality or entertainment, etc.) constitute a promise or provision or offer on the part of the Company with the intention of pushing the recipient to do something that favors it, to reward such behavior or not to do something that hurts her. The Company does not give cash or gifts that are equivalent to cash (eg shopping vouchers).

Also no entertainment is provided to anyone participating in Company business meetings, conferences, unless the entertainment is an appropriate and justified part of that event and in no case are unjustified side travel expenses and no extended travel expenses covered.

The above paragraph also applies to the companions of the participants or those invited to Company meetings, conferences or similar events of the Company. In cases where a guest is unable to travel alone (e.g. sick or minors), travel expenses for an accompanying person (e.g. career) may be paid provided the rationale for this support is valid, legitimate, documented and takes into account the applicable personal data protection requirements.

More specifically, it is prohibited for Group employees to give, promise or offer anything of value to any person with the purpose of influencing any act or decision of the person and/or the entity he/she represents, in order to secure an unfair advantage or obtain or otherwise maintain the business activities for the Group Companies.

In addition, Group employees are prohibited from making, requesting or accepting payments, offers or anything of value. Exceptions to the general prohibition are small gifts, company promotional items, or tokens of appreciation or gratitude, which are often an appropriate way in the business industry to show respect to one another.

The hallmarks of appropriate giving and receiving a gift are that the gift is symbolic, that it is offered openly and transparently, that it is properly recorded in the Company's books and records, and that it reflects only appreciation or gratitude, and that it is permissible according to local legislation. Consecutive gifts to the same person are prohibited. For any expenditure related to gifts, the applicable expenditure approval procedure followed by each Group company is observed.

Travel expenses are allowed, provided that such expenses are ordinary expenses that would be required by an employee of the Company under the same circumstances and are properly recorded in the Company's books.

The granting of reasonable and bona fide travel and accommodation expenses, especially to a Government or Foreign Public Official, is permitted when properly authorized, properly recorded in the Company's books and under the circumstances in which the expenses are directly related to the display, demonstration or explanation of the Company's products or services or related to the Company's performance or processing of a contract with a government or organization **and there is an express affirmative statutory provision**.

Therefore, travel expenses to public servants **are allowed only if the travel is for the purpose of training or inspection of facilities or for any other purpose related to the business activities and their smooth operation and continuation.** The following types of expenses are prohibited:

- Expenses for family members accompanying the person in question
- Expenses for extra days of travel to tourist destinations or visits to family or friends.
- Entertainment and travel expenses, such as reasonable expenses for meals and travel are allowed as long as the applicable expense approval process followed by each Group company has been followed.

Before any action involving the provision of a business gift, hospitality or entertainment to anyone, the impact it will have on the Company's reputation (Reputational risk) is assessed.

2.3 Rules relating to public officials

The Company does not discriminate in matters of providing or receiving any financial or non-financial benefit, whether it is about employees who have been assigned, even temporarily, the exercise of public, municipal or community service, whether it is about another legal entity under public law or private officials.

Any relationship or contact with public officials as they are defined in accordance with the Law strictly complies with the Greek Legislation (see Law 4829/2021) as well as additional rules or regulations to which they themselves are subject and has been set by the agency or their employer. Any benefit allowed by the Law and the above procedures and concerning a public official or service will be subject to the principles of ex ante transparency based on the approval process, but also ex post in the context of accountability and documentation of the legal act, (such as, for example, registration in the Transparency Register, an electronic database, which is recommended for the registration of information related to the exercise of influence activities.)

2.4 Political contributions

The Company has a policy of not making political contributions. However, since public policy issues affect the Company, its employees and the communities in which it operates, in some cases it may be appropriate to use its resources to contribute to, for example, civil protection issues. Political contributions are never made with the expectation of any direct or immediate return for the Company, or with the purpose of influencing those involved not to take part in elections or votes (for example, indicative and not limiting cases of

parliamentary, regional, municipal elections) or to vote in favor of the Company and the interests of its stakeholders.

Contributions that could be included in this category should cumulatively meet the following conditions in their entirety:

• Comply with applicable laws, regulations and Codes of Professional Conduct.

• They are referred to in a separate section of the Company's annual budget, duly approved during the normal budgeting process

• They are approved in advance by the Company's Board of Directors, after a positive Recommendation by the Quality and Compliance Department.

2.5 Lobbying

The Company is not a representative of interests and does not carry out any kind of direct communication in this capacity with institutional bodies, which aims to influence the decision-making process, and in particular, regarding the content of a law, presidential decree, ministerial decision, other regulatory administrative act or circular and which is conducted for a fee, in the context of representing the interests of its clients regardless of whether the process is ongoing, or following the communication, and regardless of the outcome of the communication with the exceptions listed below:

• being invited by its institutional bodies to provide information during the decision-making process,

• legal or other type of professional representation aimed at exercising rights, such as in particular the rights of information, hearing and appeal in any procedure,

• participating in collective negotiations with members of trade unions, as provided by labor legislation, if they act in this capacity,

• discussion with members of a diplomatic mission or consular authority, or with representatives of member states of the European Union, or third countries, or with representatives of the European Union, or other European and international organizations, as long as they are acting in their official capacity.

This communication is under no circumstances used in a way that makes it suspicious of corruption or illegality or to influence in an impermissible way any decision. Legislation as well as similar related bodies (eg State, Government Public Relations) will provide the relevant guidance on the right way to exert pressure based on the values of transparency, honesty and integrity.

2.6 Facilitation Payments

The Company prohibits facilitation payments such as for the purpose of avoiding unnecessary bureaucratic delays in the provision of services or collection of claims, regardless of whether national or local laws allow them in the countries where the service is provided. The same prohibition also applies to the receipt of any benefit, regardless of financial value, by employees of the Company for carrying out work on its behalf.

2.7 Third parties

The Company will only involve third parties if all of the following conditions are met cumulatively:

• There is a reasonable and legitimate need for the services or goods they provide

• Services and goods are priced at no more than market value

• The third parties have been deemed appropriate from an anti-bribery point of view following an assessment made in a due diligence process.

- There is a written contract or other document with similar legal effect (e.g. Purchase Order)

Acceptance of their services or goods must be documented and comply with the requirements set forth in Section 2.8 of this Policy.

The involvement of third parties will never be used to create an incentive, or to reward or secure any improper business advantage for the Company.

2.8 New ventures and joint ventures

Prior to entering into a new business agreement or entering into a joint venture, an anti-bribery due diligence assessment will be completed. In addition, a remediation plan will be developed and implemented to address significant issues identified.

2.9. Charitable donations

It is prohibited to provide a charitable donation for the purpose of improperly influencing a Government Official, Public Official or any other person, in exchange for any improper favor or benefit for the Group Companies.

Donations directly to a government agency, foundation, agency, or local community may be permitted as part of a philanthropic behavior based on meaningful human solidarity. In general, charitable donations are permitted when they are part of the practices of the Group Companies regarding donations and are duly entered in their books and are approved by a relevant decision by the company's Board of Directors. Donations may include giving money or free products or services. Donations must be made within the framework of the legislative provisions.

All proposed donations are evaluated and should be supported by the relevant department, based on their importance, as well as the clarity and validity of the supporting material and documentation of the proposal. The relevant department should evaluate the proposal and conduct due diligence on the beneficiary organizations / persons in order to ensure that the proposed donations are offered as part of the Group's philanthropic effort and cannot be used as a means to unfairly influence decisions or actions in order to benefit any of the Group Companies.

All proposed donations are evaluated and should be supported by the appropriate department and submitted for approval under the Approval Jurisdictions of each Group Company.

The relevant department keeps a register for the donations offered by the Group, while the payment slips and payment receipts are kept by the Finance Department of the respective Group company.

The above general rules and main controls should be observed - primarily - in accordance with the Legislation and Group Policies.

2.10 Staff selection

All Group Companies **should not employ Government Officials as hiring such persons would involve providing assurance of money directly to a Government Official.**

In addition, all Group Companies should exercise caution and follow the Human Resources Recruitment Procedures of the Group Companies regarding the hiring of family members and close friends of Government Officials, as job offers to such persons may be perceived as "Anything of value" provided to Government Officials.

The Human Resources Division follows clear procedures governing such relationships with government officials, as well as for family members and close friends of government officials, including:

i. Check if the suspension period has passed when hiring people from the public sector.
ii. Apply the same, or no less stringent, hiring policies and procedures that would apply to a non-government employee for such a position. More specifically, an interview is held where it is examined that the candidate fits the needs of the position and is in line with the culture and values of the Group Companies.
iii. Ensuring that the compensation of such persons is reasonable and appropriate for the position and consistent with the similar position of any other person employed by the Company.
iv. Following the same performance review process that would be followed for a comparable non-government employee after hiring the former Government Official.

The above general rules and main controls should be observed in accordance with the Human Resources Recruitment Procedures of the Group Companies.

2.11 Books and records / internal audit

The Company, based on its statutory obligations, maintains an adequate system of books and records which accurately and reasonably document the source and use of its income and assets.

The use of "off-balance sheet" accounts for all the above actions as well as false or misleading entries in the Company's books and records are strictly prohibited. All financial transactions are documented, regularly audited and properly recorded in the Company's books and records. All relevant financial controls within the Company and the approval procedures provided for, as well as controls by external independent auditors, are complied with.

The maintenance and filing of the Company's records is consistent with accounting standards and tax legislation as well as the existing legal framework governing the operation of the Company as well as the

relevant authorities that Supervise it (such as the Capital Market Commission, the National Authority of Transparency and the Single Public Procurement Authority).

3. IMPLEMENTATION

3.1 Education

All Company employees, regardless of their employment relationship, and partners must familiarize themselves with this Policy, the procedures, forms and instructions that supplement it. Therefore, they should be trained at regular intervals according to the training program drawn up by the Company based on its compliance requirements in dealing with corruption. Training requirements for third parties are determined by the Company's third party anti-bribery policy.

External contractors and external service providers not included in the third parties are trained in accordance with the relevant directive.

3.2 Reporting potential misconduct / non-enforcement - retaliation

Any Associate who learns of a possible violation of applicable laws or this Policy should report it immediately in accordance with the relevant section of the Company's Code of Conduct entitled "How to Report Possible Misconduct."

Associates who, in good faith, report possible wrongdoing or who provide information or otherwise assist in any investigation or investigation of possible wrongdoing will be protected from retaliation.

3.3 Violation of this Policy

The Company has zero tolerance for non-compliance with this Policy. Violations of this Policy may lead to disciplinary and other actions up to and including termination of the employee's employment as well as termination of the contract with a partner.

3.4 Exceptions

There are no exceptions to compliance with applicable laws, regulations and any codes of conduct governing the Company's relationships.

The Chief Quality and Compliance Officer together with the Legal Counsel and the CEO decide on matters related to anti-bribery and not covered by this Policy.

3.5 Responsibilities and Application

It is the responsibility of each manager of the Company to apply this Policy within the scope of his operational responsibility. It is also important that he exemplifies the Policy and provides guidance to associates who report to him. All supervisors should seek to motivate subordinates as well as evaluate their performance in dealing with bribery cases.

All employees and associates are responsible for following the principles and rules set forth in this Policy.

In more detail:

i. the Board of Directors of each Group Company approves the Policy. Any amendment is approved by the Board of Directors of each Group Company and analyzed in terms of its feasibility.

ii. The Regulatory Compliance Department and the Quality and Compliance Department of the Group's parent company are the owners of the Policy and jointly have overall responsibility for updating and monitoring the Policy. These offices are also responsible for handling any report or concern about incidents of bribery and corruption. These two departments are in charge of the continuous training of the staff in matters related to this policy. These departments jointly inform the Board of Directors of each Company of the Group about the necessary changes in the Policy.

iii. All employees are responsible for ensuring compliance with the Policy and preventing, detecting and reporting bribery and other forms of corruption.

iv. Internal audit is part of the anti-bribery program, as its purpose is to examine risks, evaluate the effectiveness of controls, contribute to improvement and identify incidents of bribery and corruption.

v. The Human Resources Department evaluates potential conflicts with this policy when selecting personnel.

This Policy was approved by a decision of the Board of Directors on 23-10-2023.