



ETHICS AND ANTI-BRIBERY AND CORRUPTION POLICY

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INTRODUCTION

The company "**IATRIKO ATHINON E.A.E.**" (ATHENS MEDICAL CENTER S.A.) and its affiliated companies that make up the "IATRIKO ATHINON" Group of Companies (hereinafter referred to as the "Company" or "the Parent Company or "Group"), since its establishment in 1984, has envisioned the provision of high-quality healthcare services to society. To achieve this vision, the Company has continuously invested in highly qualified scientific, nursing, and administrative personnel, in innovative medical technology, and in **an environment founded on integrity, transparency, and high ethical standards.**

Today, in an ever-changing business environment, IATRIKO ATHINON E.A.E. remains faithful to the vision of its founder, Dr. Georgios V. Apostolopoulos, continues to remain committed to the Principles and Values of its Founder and to safeguard its business ideals in every possible way.

Business ethics and the fight against corruption and bribery are among the most serious and difficult issues facing modern entrepreneurship internationally, as the existence of such phenomena poses a threat to good governance, undermine economic and social development, and distort free competition.

Our Company complies with Greek law and implements Corporate Regulations, Corporate Policies, and Internal Controls through which more effective corporate governance and proper individual and professional conduct are achieved in the context of maintaining a high level of healthcare services and preserving our good reputation in society.

In this context, the Company, reinforcing its uncompromising commitment to zero tolerance for any kind of behavior and phenomena that are contrary to its Principles and Values, establishes this "Ethics and Anti-Bribery and Corruption Policy" (hereinafter referred to as the "Policy"), in the design of which it took into account the relevant Greek laws and international conventions and practices, such as the Convention of the Organization for Economic Cooperation and Development (OECD) Convention on Combating Bribery and the UN Convention against Corruption, as incorporated into Greek law (LAW 3666/2008 - Government Gazette 113/A/18.6.2008).

This Policy forms an integral part of the Company's Internal Operating Regulations.

This Policy, following its initial approval by the Company's Board of Directors (hereinafter referred to as the "BoD") on July 15, 2021, was revised and entered into force by decision No. 873/2021 of 2021, was revised and entered into force by the corresponding decision of the Board of Directors (hereinafter referred to as the "BoD") of the Company, No. 873/13/12/2024.

Any amendment to the Policy shall be made upon recommendation and approval by the Company's BoD.

Without limiting the responsibility of the BoD, the supervision of the implementation of the Policy is the responsibility of "Regulatory Compliance," which may provide clarifications on the guidelines and resolve any issues related to its implementation.

Significant matters that deviate from this Policy are referred to and reviewed by the Board of Directors.

1. SCOPE OF APPLICATION

The Policy applies to all employees and associates of the Company, regardless of position, including members of its Board of Directors. It also governs any other third party acting on its behalf.

Specifically, the Policy is addressed to:

- to the Members of the Company's Board of Directors,
- the General Managers, Senior Executives, Advisors, and Employees (medical, nursing, and administrative staff) of the Company,
- to External Partners and Suppliers who do business with the Company,
- to any third party that cooperates or transacts with the Company,
- The Policy is also applied by all companies that make up the IATRIKO ATHINON Group (hereinafter referred to as the "Group"), which consists of the Parent Company and its subsidiaries, in accordance with International Accounting Standard (IAS 27).

2. ETHICS

All business activities of IATRIKO ATHINON E.A.E. and the companies of the IATRIKO ATHINON Group are based on respect for people and society, and are supported by the principles of Greek and European legislation, international treaties and practices, and the values and ethics of the Company, which are always guided by the principles of Greek and European legislation, international treaties and practices, and the values and ethics of the Company. prosperity, and development of the Group, always in accordance with the principles laid down by Greek and European legislation, international treaties and practices, and **the values and ethics of the Company, which can be summarized as follows:**

- **Compliance with the laws of the State, internationally recognized standards and guidelines, as incorporated into the Company's individual policies (Business Partner Ethics Policy, Human Rights Policy, Prevention and Combating of Violence and Harassment in the Workplace Policy, Whistleblowing Policy)**
- In standards of conduct such as:
 - ★ Respect and dignity in professional interactions, respect for the principle of equality – individual rights – diversity, ensuring equal opportunities for growth and professional development
 - ★ Integrity – honesty – diligence
 - ★ Transparency – accountability – consultation
 - ★ Efficiency and innovation
 - ★ Meritocracy and social responsibility

2.1 BEHAVIORAL STANDARDS

The cultivation, establishment, and consolidation of a stable, modern, and healthy corporate environment that promotes the work of the Company and the Group and is characterized by the principle of equality (especially with regard to gender), respect for individual rights and respect for diversity is the responsibility of us all.

We must therefore treat our colleagues and associates with respect and dignity and not tolerate any form of discrimination or harassment in the workplace. In this way, we ensure the creation of a working environment of equal opportunities for growth and professional development for all – a basic prerequisite for healthy business activity, social cohesion, and progress.

The image of the Company and the Group is directly linked to the behavior exhibited by each and every one of us. Therefore, we must all behave in a manner that does not damage the business image, reputation, and standing of the Company and the Group.

2.2 INTEGRITY

We act with integrity, honesty, and diligence in all our work, defending the Company and the Group above any personal or other private interests.

We behave objectively, not allowing conflicts of interest, as referred to in the Company's specific "Conflict of Interest Policy," to influence our professional judgment by third parties.

2.3 TRANSPARENCY – ACCOUNTABILITY – CONSULTATION

We operate with transparency, accountability, and open communication, informing and consulting with all stakeholders.

We intend to build and strengthen the trust with our customers and stakeholders in the procedures and operation of the Company and the Group.

2.4 EFFICIENCY & INNOVATION

We promote efficiency and innovation in all our activities.

We aim to implement our strategy and business and other decisions correctly and quickly, based on the proper and careful use of the Company's assets and reliable communication with investors and the public.

We encourage the development of new solutions and ideas that add value and improve the quality of our services.

2.5 MERITOCRACY AND SOCIAL RESPONSIBILITY

We operate in a meritocratic manner, promoting diversity while ensuring equal treatment and opportunities in the workplace, without allowing prejudice.

We must all understand and embrace the principles and values of the Company and the Group, act responsibly towards them and towards society as a whole, and to behave in accordance with the principles of professional and business ethics, which do not damage their image, reputation, and work.

As part of our Corporate Social Responsibility, we make decisions and take action to improve the quality of life of the Group's employees and society as a whole, as well as to protect the environment for a sustainable future, by undertaking or participating in initiatives such as providing transportation and meals for employees, voluntary blood donation, charitable activities, free medical services for residents of border areas, continuous efforts to reduce our environmental footprint, implementation of best practices in recycling, waste management, etc.

3. GIFTS

The exchange of gifts and forms of hospitality/entertainment between employees, external partners, consultants, and other third parties is common practice in the business world.

The purpose of this Policy **is to define the boundaries of acceptable business practices, within the context of legitimate social courtesy and professional interaction.**

The giving and receiving of small-value, non-monetary corporate gifts and hospitality/entertainment is permitted, but only within the bounds of normal social decorum and business practice, and always in accordance with this Policy.

3.1 GUIDELINES

Members of the Board of Directors and persons exercising managerial functions in the Group's companies, employees and associates, suppliers, customers, and other business partners of the Company and the Group should not offer, accept, or encourage the giving or receiving of material gifts or hospitality/entertainment unless they meet the following conditions:

- the value, quantity, and frequency shall remain within reasonable limits, for example hospitality or entertainment of reasonable cost, provided that interactions with the same person are not recurrent, as well as small or symbolic gifts and promotional items,
- offered within the framework of normal business practice and are appropriate to the occasion and the circumstances,
- to the extent known, they do not contravene the internal policies or regulations of the other company or organization involved,
- there is no direct or material connection with any specific business decision concerning the business partner involved.
- in all cases, gifts, hospitality, and entertainment must be of a nature that could withstand public scrutiny without compromising the Company's professional image, reputation, or integrity.
- **The maximum acceptable value of a gift shall not exceed one hundred (100) euros per calendar year, or four hundred (400) euros for members of the Company's senior management.**

Prior to offering or accepting gifts or any form of hospitality or entertainment, relevant information must be submitted for review by the Company's/Group's Regulatory Compliance Officer in cases where the value of such gifts, hospitality, or entertainment exceeds the customary limits of social courtesy and business practice, or the maximum threshold defined in this Policy. In such cases, the corresponding Gift, Hospitality, and Entertainment Reporting and Approval Forms must be completed and submitted to the Company's/Group's Regulatory Compliance Officer, as attached to this Policy (Annexes II and III). All records of reports and related approvals required under this Policy shall be maintained by the Group Regulatory Compliance Officer, who is responsible for keeping the Register of Gifts, Hospitality, and Entertainment (Annex IV).

When more than one Company representative is present, the cost of hospitality shall be borne by the most senior representative in attendance.

In all cases, any gifts, hospitality, or entertainment must be conducted with transparency and must not

imply or entail any obligation on behalf of the recipient or the Company.

If gifts or hospitality/entertainment are offered that exceed the established guidelines and are not permitted under this Policy, the recipient should politely decline and explain the Company's rules.

If, due to the circumstances, refusal or return is difficult or may cause offense, the matter shall be promptly reported to Regulatory Compliance, which will advise on the appropriate course of action.

3.2 UNACCEPTABLE GIFTS AND HOSPITALITY

It is very important to maintain an equal distance in our professional relationships and transactions.

In this context, it is prohibited to give or accept gifts, hospitality/entertainment (and any other benefits) related to the performance of your duties, which are intended or may give the impression that they are intended to induce you to undertake any obligation, the creation or maintenance of a business advantage for you or the person offering the gift/hospitality/entertainment.

Under no circumstances shall monetary gifts or cash equivalents be given or accepted beyond the conditions and limits set forth in this Policy.

In certain cases, the provision or acceptance of gifts or hospitality/entertainment of value may be interpreted as bribery, or may even create the suspicion of bribery, leading to potential civil and criminal liability and serious consequences for the Company, its employees, and any other parties involved.

3.3 GOVERNMENT OFFICIALS AND PUBLIC SERVANTS

The Company's policy prohibits any kind of giving or receiving of gifts, hospitality/entertainment to/from government officials and public servants.

This does not apply to hospitality (e.g., business lunches) at work-related events, which take place within the framework of the Company's normal cooperation with state and government bodies, or within the framework of other Company events to which the public official is invited for representation purposes only and provided that it is of small value, compatible with the nature of the cooperation relationship, and proportionate.

If there is any uncertainty as to whether the person you are dealing with qualifies as a government official or public servant, you must seek advice from the Company's Regulatory Compliance Officer.

4. CORRUPTION AND BRIBERY

The Company and the Group are opposed to any form of corruption and bribery/graft, whether committed directly or indirectly through third parties/intermediaries. The diagram in Appendix I of this Policy summarises some of the situations that are likely to arise and how we should act in each case.

4.1 ZERO TOLERANCE

Compliance with both the applicable legal framework and this Ethics and Anti-Bribery and Corruption Policy is everyone's responsibility.

The Company/Group prohibits any form of corruption and bribery and shows zero tolerance for any behavior or suspected behavior that does not comply with this Policy.

Such misconduct is illegal, unconventional, and subject to the relevant provisions of the Internal Regulations of Employment Conditions of each Clinic of the Group, the Human Resources Process of the Human Resources Management Department, as well as the relevant provisions of the law.

4.2. CONCEPTS AND FORMS OF CORRUPTION AND BRIBERY

Corruption: the abuse of power, position, or status for personal gain (monetary and/or non-monetary). This includes, for example, bribery/acceptance of bribes, extortion, nepotism, embezzlement, and conflicts of interest.

Bribery & Acceptance of bribes: any form of promise, provision, offer, or acceptance, directly or indirectly, to/from an employee in any capacity in the public and/or private sector, benefits of any kind for themselves or for a third party, with the aim of performing or omitting an act in violation of their duties.

4.2.1 FACILITATION PAYMENTS

Facilitation payments are those made for the processing or expediting of necessary procedures or routine services that are otherwise required by law to be performed, some of them within a time frame specified by the law itself. Any kind of facilitation payments are illegal and prohibited. If you are asked for such payments, you must report it immediately to the Company's Regulatory Compliance Officer.

4.2.2 THIRD PARTIES

The Company may be held liable for acts of corruption and bribery committed by third parties performing work on its behalf.

Before commencing cooperation and signing the relevant contract with any third party, and following due diligence procedures, the principal of the cooperation, the Procurement Department through approved suppliers, and the Company's Legal Department must verify, among other things, that the reputation, the prestige and capabilities of the specific party are adequate and satisfactory and that cooperation with it is not likely to jeopardize the Company and the Group.

In any case, third parties must be contractually bound to combat corruption and bribery.

Any indications of deviation by the third party in terms of reputation, prestige, and capabilities from the operational principles and values of the Company and the Group should be reported to the "Company's Regulatory Compliance Officer."

4.2.3 COMBATING THE LEGALIZATION OF INCOME FROM ILLEGAL ACTIVITIES

The Company and the Group are committed to effectively combating the laundering of proceeds from illegal/criminal activities. To address such phenomena, the Company and the Group implement appropriate measures both in terms of evaluating the third parties with which it cooperates and transacts, and in terms of continuously informing staff about the prevention of such phenomena.

We must therefore all comply with the existing legislation at all times and report any suspicious transactions to "Regulatory Compliance."

4.2.4 POLITICAL CONTRIBUTIONS, DONATIONS TO POLITICAL PARTIES

No contributions, donations, financial support, or other benefits or facilities may be provided to political parties, movements, or organizations, party representatives, government officials, or candidates for public office. If in doubt, consult the "Company's Regulatory Compliance Officer".

In the event that employees and associates of the Company and the Group make such contributions within the framework set by law, personally (on their own behalf and from their own funds), this must not be done with the aim of influencing a third party for the benefit of the Company and the Group.

In any case, they should be particularly careful not to give the impression in any way that these are contributions made by the Company and the Group or are directly or indirectly linked to them.

4.2.5 DONATIONS AND SPONSORSHIPS

As part of its social responsibility activities, the Company may, in specific circumstances and only following a prior decision by the Board of Directors or its legal representatives, make donations in cash or in kind (e.g. provision of services or material goods) for charitable purposes (e.g. in the fields of culture, education, the environment, research/innovation, vulnerable social groups), or in cases of emergency (e.g. natural disasters, armed conflicts, terrorist attacks). These donations should be consistent with the actions set out in the Company's Sustainable Development Strategy and should be directed to reputable institutions and organizations.

In addition, the Company/Group, within the framework of its corporate social responsibility activities, may, through the usual control and contracting procedures, make donations (i.e., cash contributions or the provision of services or material goods in exchange for specific and defined consideration) to sports, cultural, educational, or other charitable and social associations, organizations, bodies, and/or activities related to the environment, research/innovation, and entrepreneurship.

In any case, following the due diligence procedures applied to third parties, it should be ensured, among other things, that the activities, the reputation and prestige of the specific entity/organization receiving the donation/sponsorship are adequate/satisfactory and that any donation/sponsorship is not likely to expose the Company and the Group to any risk. The check is carried out by Regulatory Compliance Officer and includes a review of the statutes and other documents of the recipient of the donation/sponsorship, the correspondence between the reciprocal benefit and the amount of the sponsorship, the possible involvement of a politically exposed person in the recipient of the

donation/sponsorship, the existence of any publications on suspicious activities of the recipient of the donation/sponsorship.

In addition, all transparency requirements regarding the effective use of resources allocated for donations/grants must be met, and under no circumstances should any donation or grant be intended to secure an undue advantage.

The Company's Compliance Officer keeps a record of sponsorships and donations.

5. INFORMATION AND TRAINING

The Company and the Group ensure that their executives, employees, and associates are constantly informed, aware, and trained on issues related to combating corruption and bribery.

In this context, the Company's "Regulatory Compliance" department communicates relevant messages and develops and implements training programs.

6. VIOLATIONS, REPORTS, AND RESOLUTION OF QUESTIONS

Anyone who commits and/or engages in the unlawful concealment or cover-up of the offense of corruption or bribery in the course of their duties will be held liable under the law (including criminal prosecution) in accordance with the relevant provisions of Greek law.

The Company encourages its executives, employees, and associates to immediately report all cases of possible corruption and bribery by submitting a relevant report (using the online platform at the following address:

<https://app.myethos.eu/mailbox/d979fa28-49d6-439f-a52e-dfb7306f23fb>

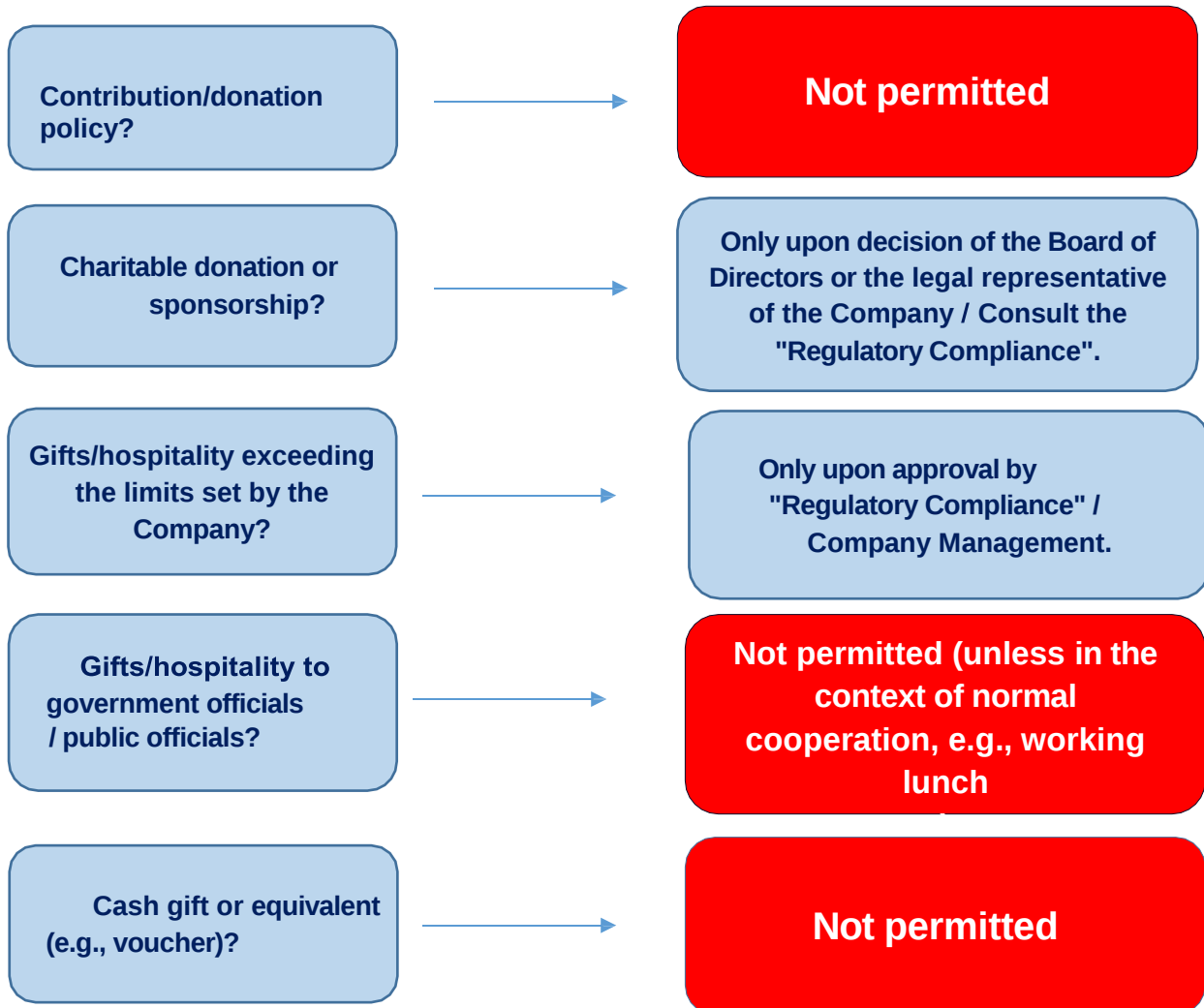
as described in the Company's "Whistleblowing Policy."

Therefore, if you notice any behavior that concerns you, you should report it immediately to the Company's Regulatory Compliance Officer (compliance@iatriko.gr).

The Company treats all reports of potential misconduct with utmost seriousness. Confidentiality is ensured in every case, and an investigation is carried out in accordance with the Company's "Whistleblowing Policy."

Any questions or doubts regarding compliance with this Policy should be addressed to the Company's Regulatory Compliance Officer, who is responsible for overseeing and managing all matters related to its implementation.

ANNEX I: FLOWCHART



If in doubt, consult "Regulatory Compliance"

ANNEX II: REPORTING AND APPROVAL FORM FOR GIFTS AND HOSPITALITY

Employee name:

Date of report:

Recipient's name and title	Company name /organization	Brief description of gift or hospitality/entertainment	Proposed date	Estimated value (per person)	Have you offered a gift or hospitality/entertainment to the same person in the last 12 months?

Approval:	[Yes] / [No]
Date	
Name and Signature	

¹ If the answer is yes, please provide more information about the date and value.

ANNEX III: REPORT AND APPROVAL FORM FOR THE ACCEPTANCE OF GIFTS AND HOSPITALITY

Employee name:

Date of report:

Name and title of provider	Company name /organization	Brief description of gift or hospitality/entertainment	Date received	Estimated value (per person)	Have you received a gift or hospitality/entertainment from the same person in the last 12 months? ²

Approval:	[Yes] / [No]
Date:	
Name and Signature	

² If the answer is yes, please provide more information about the date and value.

ANNEX IV: SAMPLE ANNUAL REGISTER OF GIFTS AND HOSPITALITY GIVEN AND RECEIVED

[illegible]

ANNEX VI: DOCUMENT HISTORY

Date of Issue/ Revision	Issue Number	Details of Changes	Approval	Date
15.07.2021	1		Board	15.07.2021
23.12.2024	2		Board of Directors No. 873	23.12.2024

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