

# TECHNAVA S.A.

## ANTI-BRIBERY AND CORRUPTION POLICY

### 1. Scope and Applicability

Technava S.A. (“Technava” or the “Company”) conducts its business in an honest and ethical manner, and applies a zero-tolerance approach to bribery and corruption. The Company is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships, wherever it operates, and to putting in place and enforcing effective systems to counter bribery and corruption.

Technava subscribes to the Ten Principles of the United Nations Global Compact. The Tenth Principle provides that “businesses should work against corruption in all its forms, including extortion and bribery”. The Company will comply with all laws relevant to bribery and corruption in each jurisdiction in which it conducts business. In particular, this Policy is intended to ensure compliance with:

- Articles 235, 236 and 237 of the Greek Penal Code (active and passive bribery of public officials and judicial officials);
- Article 396 of the Greek Penal Code (bribery in the private sector);
- Law 4557/2018 on the prevention and suppression of money laundering and terrorist financing, as amended, which transposes Directive (EU) 2015/849 and subsequent amendments;
- Law 3560/2007, ratifying the Council of Europe Criminal Law Convention on Corruption;
- Law 2656/1998, ratifying the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- the UK Bribery Act 2010, and the United States Foreign Corrupt Practices Act (FCPA), to the extent that any Company activity falls within their scope.

The Policy applies to all individuals and entities working for or on behalf of Technava at all levels, whether permanent, fixed-term or temporary, and wherever located. That includes directors, officers, employees, contractors, consultants, agents, intermediaries and any other third party acting for the Company (“Personnel”).

Failure to comply with the Policy may result in legal and/or disciplinary action against the individuals concerned, and may also expose the Company itself to criminal, civil and administrative liability, including under Law 4557/2018 and Article 401 of the Greek Penal Code.

### 2. Definitions

#### ***Bribery***

“Bribery” means the offering, promising, giving, accepting or soliciting of money, a gift or any other advantage, whether directly or indirectly, as an inducement or reward for a person to act (or to refrain from acting) in a manner that is unlawful, unethical or in breach of a duty of good faith, impartiality or trust. Bribery may occur in dealings with public officials or between private parties.

A bribe can take many forms. Examples include:

- any direct or indirect promise, offer or authorisation of anything of value;
- the giving or receiving of any inducement, loan, fee, reward or other advantage;
- charitable or political contributions made with a view to exerting improper influence; and
- favours extended to relatives, friends or business associates of another party in order to influence that party.

### **Corruption**

“Corruption” means any dishonest, abusive or unlawful conduct by a person who has been entrusted with a position of authority or trust, in the public or the private sector, with a view to obtaining an improper benefit or advantage for themselves or for another. Examples of corruption include:

- using a position of power to force or induce others to perform illegal or unethical acts;
- falsification of corporate records, invoices or accounts;
- arrangements that distort competition; and
- embezzlement or misappropriation of assets.

### **Facilitation Payments**

“Facilitation payments” are small, unofficial payments made to a public official to secure or speed up a routine governmental action. Such payments are prohibited by this Policy in all circumstances, regardless of local business custom.

## **3. Basic Principles**

Technava addresses bribery and corruption risk through a programme based on the following principles:

- zero tolerance of bribery and corruption in any form;
- internal controls designed to prevent, detect and respond to bribery and corruption, and kept proportionate to the Company’s risk profile;
- confidential, safe and accessible reporting channels, protected by the Anti-Retaliation Policy;
- periodic risk assessment of the Company’s structures, operations and third-party relationships, with controls adapted in light of the results;
- a register of bribery and corruption reports, incidents and remediation steps;
- risk-based due diligence on third parties, and a formal questionnaire setting out the Company’s expectations on bribery and corruption;
- training and awareness briefings for Personnel, proportionate to role and risk exposure;
- accurate and complete books and records that fairly reflect the Company’s transactions and disposition of assets;
- cooperation with the competent authorities when required or appropriate.

## **4. Gifts and Hospitality**

The Company does not prohibit the offering or acceptance of gifts or hospitality, provided they comply with the criteria set out below. Gifts and hospitality may range from items of nominal value (for example diaries, flowers, or modest food and drink) to more substantial items (hosted meals, receptions, or tickets to significant events).

Any gift or hospitality offered or received must:

- be reasonable, proportionate and of modest value in the circumstances;
- be given or received openly and not in secret;
- comply with applicable law and with the rules that apply to the recipient (particularly where the recipient is a public official);
- not create, or be capable of being perceived as creating, any obligation or influence over a business decision;
- not form a recurring pattern of behaviour; and
- be recorded in the Company's gifts and hospitality register where the internal procedures so require.

Cash, or any cash-equivalent (such as gift cards or vouchers that can be redeemed for cash), may not be given or accepted under any circumstances. Any gift or hospitality involving a public official is subject to heightened scrutiny, and, where there is any doubt, must be cleared in advance with the Legal and Compliance function.

## **5. Political Contributions, Donations and Sponsorships**

Technava does not make contributions to political parties, candidates or campaigns as a means of obtaining or retaining business or a business advantage. Charitable donations and sponsorships must be made transparently, recorded accurately in the Company's books and not used as a channel for improper payments. Any proposed donation or sponsorship involving a public official, or a person connected with a public official, must be approved in advance by the Legal and Compliance function.

## **6. Third Parties**

A significant share of bribery risk arises from the acts of third parties engaged to act on a company's behalf. Before any agent, intermediary, distributor, consultant or similar third party is engaged, and periodically thereafter, the Company will carry out risk-based due diligence on the counterparty.

Where appropriate, contracts with such third parties will include anti-bribery representations and warranties, a requirement to comply with this Policy and with applicable law, audit rights, and a right of termination in the event of a breach.

## **7. Books, Records and Internal Controls**

Technava keeps accurate and reasonably detailed books, records and accounts that fairly reflect all of its transactions and the disposition of its assets. No off-the-books accounts or unrecorded transactions are permitted. Personnel shall not create, or take part in the creation of, any false, misleading or artificial record or account.

## **8. Training**

Personnel will receive training, proportionate to their role and risk exposure, on the prevention and identification of bribery and corruption. Training is delivered on induction and refreshed periodically. Internal communications are used to raise awareness of emerging risks and of the lessons learned from actual cases.

## **9. Reporting Concerns**

Any person who suspects, witnesses, or is asked to take part in conduct that may be in breach of this Policy must report the matter through one of the following channels:

- by email to [compliance@technava.gr](mailto:compliance@technava.gr);
- by telephone to the Company's dedicated compliance line at [+30 2104138768], including through the secure voicemail service outside business hours;
- to the Human Resources Department or the Legal and Compliance function; or
- to the Reporting Officer designated under Article 9 of Law 4990/2022.

Reports may be submitted anonymously. All reports are treated in confidence and handled in accordance with the Company's Anti-Retaliation Policy, with Law 4990/2022 and with Regulation (EU) 2016/679. No person making a report in good faith will suffer any detriment as a result of having done so.

## **10. Disciplinary Process**

Technava applies its disciplinary procedures consistently, fairly and in a timely manner to all Personnel, regardless of seniority. A breach of this Policy may lead to disciplinary action up to and including dismissal and, where appropriate, referral to the competent authorities.

Where a third party is found to have breached this Policy, the Company may terminate the relationship, seek compensation for any loss suffered, and refer the matter to the police, judicial or supervisory authority. Civil and/or criminal proceedings may be brought against those involved.

When engaging with third parties (whether natural or legal persons), the Company obtains a written acknowledgement of their obligation to prevent and combat bribery and corruption in accordance with this Policy. Where bribery or corruption by a third party is established, the cooperation will be terminated and the matter reported as appropriate.

## **11. Responsibility and Review**

The Chief Executive Officer is ultimately responsible for this Policy. Day-to-day administration, including the receipt and handling of reports, risk assessment and training, sits with the Legal and Compliance function, in coordination with the Human Resources Department.

The Policy is reviewed at least once a year, and more often if required to reflect changes in applicable law, in the Company's operations or in the risks identified through the Company's risk assessment.