

ANTIBRIBERY POLICY

EXERGIA ENERGY AND ENVIRONMENTAL CONSULTANTS S.A. is an independent Greek consulting and engineering company, active internationally in the energy and environment sectors, committed to the creation, implementation, maintenance and continuous improvement of the anti-bribery Management System which it implements according to **ISO 37001:2016**.

EXERGIA S.A. are committed to high standards of ethical behaviour and requires all Directors, Top Management, employees, business associates and other stakeholders, with whom they conduct business with, to comply with this policy without exception.

All Employees/Staff, including Board of Directors and Top Management, have been trained in relation to this policy.

Our Company:

- prohibits Bribery.
Any deviation from the anti-bribery policy, participation in bribery, corruption, facilitation payments or any other illegal act will result in the termination of the business relationship.
- does not cooperate with companies involved in corrupt practices and immediately stops any relationship with a client or other interested parties if such cases arise.
- complies with anti-bribery legislation, which applies to the company and requires compliance by all stakeholders.
- sets goals for the fight against bribery, which are reviewed annually in terms of their degree of implementation, new ones are approved, or older ones are modified depending on the performance of the company and the new conditions - new projects, in its field of action.
- is committed to meeting the requirements of the Management System and its continuous improvement
- encourages reporting of suspicions in good faith or on the basis of reasonable belief, confidentially and without fear of retaliation

Where partners or other parties represent EXERGIA S.A. they will be required, as part of their contractual obligations, to agree to follow this policy. All their remuneration and expenses must be lawful, reasonable, justified and supported by documentary evidence.

Where legal and other commercial relationships may be different in certain countries to those expected by this policy, the Chief Executive Officer (CEO) will decide on the due diligence arrangements that would need to take place before any business relationship was entered into. However, without exception, EXERGIA S.A. does not engage in the offering or accepting of bribes or other inducements. EXERGIA S.A. will not knowingly take part in any transaction where corrupt practices form any part of the arrangement.

Conflicts of interest are not acceptable. It is a condition of employment that the Board of Directors and Employees/Staff do not conduct private business, political or charitable activities within EXERGIA S.A. without prior written consent of the Chief Executive Officer (CEO). It is a contractual requirement that all contractors, partners, and other parties declare to **EXERGIA S.A.** - prior to representing **EXERGIA S.A.** in any way - if they have any actual or potential conflict of interest with a particular customer or other stakeholder.

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EXERGIA S.A. does not make any political or charitable donations without the prior written agreement of the Chief Executive Officer (CEO).

The company only permits the receiving and giving of small value gifts and hospitality where this is reasonable and commensurate with a business relationship. Gifts and hospitality are avoided if there is a risk that they may be perceived as influencing decision-making.

Directors, staff, and contractors have confidential reporting channels to raise concerns – can also be known as whistleblowing. However, all line management are briefed as to how to deal with any concerns reported to them and it is a serious disciplinary matter not to report and investigate any such concerns.

There will not be any form of retaliation due to the use of the complaint channel, under no circumstances .

There is an ABMS in place that meets the requirements of **ISO 37001:2016**. The ABMS has been implemented to prevent EXERGIA S.A. from becoming involved with any corrupt practices and to deal and report where any such activities may need further investigation and action. This is fully supported by senior management.

There is regular reporting to the Chief Executive Officer (CEO) on all ABMS matters and this policy and the processes that support it will be reviewed at least annually.

Top management defines the competence and independence of the Management System Officer and is committed to and supports the implementation of the Anti-Bribery System in accordance with this policy and the defined objectives, in order to adequately mitigate the risk of bribery for **EXERGIA S.A.**

The Compliance and Bribery Investigation Committee is responsible for answering any questions and clarifying any bribery issues regarding staff. The Compliance and Bribery Investigation Committee promotes the resolution of any issues arising from these communications.

This policy is communicated internally and externally, ensuring that customers, business associates, stakeholders and Employees/Staff are made aware of **EXERGIA S.A.** commitment to anti-bribery.

Chief Executive Officer (CEO)

03/05/2022