



Anti-corruption and anti-bribery policy

At SSA, we are firmly committed to conducting our business with integrity, honesty, transparency and respect for society and the environment.

SSA's Management, in the context of developing Policies for Good Corporate Governance and Sustainable Development, in order to enhance the Company's credibility and reputation, the clarity and efficiency of its business operations and to respond to the needs of all stakeholders (customers, suppliers, institutions, shareholders, investors, employees, society), implements proactive actions against corruption. These actions include the preparation of the relevant document "Anti-Corruption and Bribery Policy", approved by Resolution on 23-02-2023 of the Board of Directors.

This policy applies to all individuals of the Company, irrespective of the department at which they work and the title/rank they hold, including senior managers, senior employees, directors, members of Committees and Boards of Directors, employees (permanent, fixed-term or temporary), consultants, contractors and trainees (students).

It provides, among other things, for the Company's zero tolerance of all instances of corruption and bribery, its commitment to operate with professionalism, legality and integrity in all its business dealings and the establishment of measures to maintain high standards of ethics and protect its reputation.

Procedures and controls implemented have been established based on International Standard 37001:2016 "Anti-bribery management systems- Requirements with guidance for use", taking into account the operational aspects and ambitions of the Company. The organization's operating framework was adopted to achieve the Management System's Objectives, audited and reviewed on a regular basis, resulting in continual improvement.

The Company's management is committed to meeting the requirements of the system and has made it a key objective to minimize the likelihood of an incident of bribery occurring in our professional activities.

Human Resources, entirely, third parties working on its behalf or in collaboration, are not permitted to be involved in cases of bribery, as manifested by offer, solicit, promise and in any other way, passively or actively.

Non-compliance with this policy, whether intentional or unintentional, may lead to disciplinary sanctions, which may result in termination of cooperation due to serious misconduct, up to the criminal prosecution of the person involved, as defined by current Greek legislation .

Our compliance with Greek legislation and European Union directives where the company operates, is a foundation for the development of entrepreneurship in our country and the increase of activity in international markets.



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By all of us putting our values into practice and acting with honesty, fairness and integrity we will continue to develop SSA into a Company we can be proud of. This policy covers the most common forms of bribery, as well :

- Donations and sponsorships,
- Relations with political figures,
- Gifts and hospitality
- Due diligence
- Conflicts of interest

The SSA's Anti-Corruption and Bribery Prevention Team is constituted by the:

- Legal Counsel,
- Finance Director,
- President and CEO

and appoints the Compliance Officer with duties to monitor the Company's Operations.

Anti-bribery Compliance Function

The Compliance Officer has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness and addressing any questions about its interpretation. Management at all levels are responsible for ensuring that Personnel are aware of and understand this policy and that they receive adequate and regular training on it.

Ways to contact and report / complain

You may submit your complaint anonymously

By traditional way

Ethnikis Antistaseos 84, Halandri Postcode 15231

or by e-mail at

abcfuction@ssa.gr

Management Responsibility and Commitment

The Chairman and Managing Director of the Company has overall responsibility for ensuring that this policy complies with our legal and ethical obligations and that all those under our control comply with them.

The staff of the company and its customers and partners, are encouraged to report concerns about any issue or suspected wrong doing as soon as it comes to their attention. No one will face repercussions for raising serious concerns regarding bribery, corruption, improper donations and facilitation payments.

President and Managing Director

Nikolaos Broudos

Halandri, 1 March 2023