



ANTI-BRIBERY POLICY STATEMENT

AVAX S.A. is one of the most powerful construction groups in Greece, with a significant presence and critical participation in the largest and most important projects throughout the country, but also in the international market. During our years of activity in the construction industry, our company has developed a specific culture focusing on the transparency of operational procedures, with benefits in the overall efficiency. As a consequence, the Company's Management has decided to implement an Anti-Bribery Management System, in accordance with the requirements of International Standard EN ISO 37001: 2016.

The target of AVAX S.A. is to continue and expand its activities in the construction of projects while effectively fighting against corruption. This targeting can be outlined in the following key areas:

- The orientation of our company has been, is and will be prohibitive towards Bribery.
- Our compliance with laws and regulations related to Bribery is immediate.
- We adopted a Code of Conduct appropriate to the purpose of the company, as well as setting anti-bribery goals and appropriate programs to review and achieve them.
- We encourage the reporting of concerns when they are based on good faith or reasonable doubts, without fear of reprisals.
- We ensure the principle and independence of the anti-bribery function.
- We clarify the consequences of non-compliance with this policy and the Company's Code of Conduct.
- We take care to be compliant and implemented by all company staff, and all stakeholders working with the company are also committed to it.
- We constantly evaluate the risk associated with Bribery issues that may arise during the execution of company's activities and through this policy statement, we prioritize and assess the risks and opportunities that arise.
- We implement programs against Bribery and audits at regular intervals, through an independent compliance authority, to ensure its proper performance.
- We motivate our suppliers and partners to continually improve, and we train our personnel regularly to achieve the desired culture and sensitivity against Bribery.

By applying these axes we ensure full compliance with the Anti-Bribery System according to the requirements of International Standard EN ISO 37001: 2016 and our pursuit of continuous improvement.

Overall, Management is committed to regularly reviewing this Policy and the Integrated Management System, while the unceasing effort for continuous improvement forms the philosophy of all our employees.

For AVAX SA



**THE MANAGING DIRECTOR
K. MITZALIS**

AUTHORISATION DATE

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