



ANTI-BRIBERY POLICY STATEMENT

AVAX Group is one of the leading construction groups in Greece, with a significant presence in the largest projects in the country and internationally. With a unified and strong structure, leading in the construction sector, including the companies AVAX S.A., ETETH SINGLE MEMBER S.A, IXION SINGLE MEMBER S.A., TASK AVAX SINGLE MEMBER S.A., AVAX Development SINGLE MEMBER S.A., ATHENS MARINA S.A. and AVAX IKTEO S.A., the Group continues its successful course, in Greece and internationally, setting new standards.

AVAX S.A. has developed an Anti-Bribery Policy focusing on the transparency of its operational procedures and implements a certified Anti-Bribery Management System, in accordance with the requirements of the International Standard EN ISO 37001:2016.

At AVAX, the independent Compliance Function monitors the System and its proper operation and acts for the Organization's compliance with the relevant regulatory requirements and best practices (Anti-Bribery Compliance Function).

The Company seeks to continue and expand its activities in the construction sector, while ensuring the effective prevention and combating of bribery. These objectives are reflected in the following key axes:

- Zero tolerance for any attempt or act of bribery.
- Monitoring and compliance with the relevant legal and regulatory requirements at national, EU and international levels.
- Establishment of a Code of Ethics and Business Conduct.
- Establishment of anti-bribery objectives and programs for their review and achievement.
- Encouraging reporting of concerns based on good faith or reasonable suspicions, without fear of retaliation.
- Ensuring compliance with the fundamental principles and independence of the anti-bribery function.
- Clear explanation of the consequences of non-compliance with the implementation of the Anti-Bribery Management System and the Company's Code of Ethics and Business Conduct.
- Acceptance and implementation of the Anti-Bribery System by all Company personnel as well as by partners and other third parties.
- Continuous assessment and prioritization of risks and opportunities related to anti-bribery issues that may arise during or through the performance of its activities.
- Implementation of anti-bribery procedures that are regularly reviewed by an independent Compliance Function to ensure their proper implementation and effectiveness.
- Encouraging suppliers and partners to maintain continuous compliance and regular training of personnel aiming at continuous improvement and development.

The implementation of the above ensures the full compliance of the Company with the Anti-Bribery System in accordance with the requirements of the International Standard EN ISO 37001:2016, while also satisfying the requirement for continuous improvement.

Overall, Management is committed to regularly reviewing this Policy and the Integrated Anti-Bribery Management System, while the philosophy of all our employees is continuous compliance and improvement.

For AVAX S.A.

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THE MANAGING DIRECTOR
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