



REGULATORY & ANTI-BRIBERY COMPLIANCE POLICY

General Commercial & Industrial S.A. recognising the need to fight the corruption and bribery, while at the same time aiming at the reinforcement of reliability and the name of the Company, the transparency and efficiency of its entrepreneurial functions and the response to the needs and the expectations of the interested parties, has proceeded to the design, establishment and commitment for implementation and continual improvement of Anti-Bribery Management System (ABMS), according to the demands of the International Standard of Anti-Bribery Management System EN ISO 37001:2016.

The SYSTEM Implementation is:

- **INDUSTRIAL , HYDRAULIC EQUIPMENT AND TOOLS COMMERCE**

In this way the Company aims at reinforcing the Administration's Commitment to no tolerance to bribery while the personnel and the Company's partners will be aware of fighting against the bribery through the creation of a procedure list that will ensure the prevention the deterrence and the fight against bribery .

General Commercial & Industrial S.A. is committed to:

- Be complied with the applicable legal and regulatory frame work
- Satisfy the demands of the Standard of Anti-Bribery Management System ISO 37001:2016
- Encourage the confidential report of an incident or a suspicion or attempted bribery incident through specific communication way from the employees or the Company's partners without fear for being punished, to Anti- Bribery Compliance Officer (ABCO) and to the competent personnel body of the Company.
- Explain the Responsible's authority and the independence for the Compliance Function during the check of regulatory policy of the company and the compliance against bribery.
- Explain the consequences of Company's not being complied with this policy.
- Support the ABCO's work and the the independence during the check of Company's regulatory policy and the compliance against bribery.
- Point out the consequences and the sanctions in case of not being complied to this policy.
- Give all the required resources and suitable tools for personnel's education, awareness and participation about regulatory compliance against bribery aiming to continuous improvement of ABMS.
- Constantly improve the ABMS during the company's functions:
 - Evaluation of the risks and implementation of suitable actions.
 - Establish and achieve the Company's goals for the compliance policy and the anti-bribery compliance.
 - Appropriate care and check against bribery.
 - Internal audits.
 - Personnel's education and awareness
 - Managing non- conformities and corrective actions.
 - Management and Anti- Bribery Compliance Officer 's review .

The interested parties' related requirements regarding the compliance obligations connected to the current legal framework, the anti-bribery framework and the participation to ABMS have been incorporated to the company's function through the documents of ABMS.



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To the above frame, the Company's Administration is committed to support the application , check and preservation of ABMS , which will be periodically reviewed , revised and improved when needed, so as the regulatory compliance will be constantly ensured to the current legal framework and the anti- bribery framework.

The executives and the employees of the **General Commercial & Industrial S.A.** and the partners working for the company are not allowed to offer, promise or bribe anyone as well as not to be bribed by anyone.

The current policy is committing for the administration, the executives, the employees and every person connected with the company's function, including and every external provider and professional partner.

Non compliance with the current policy , intentionally or unintentionally, may cause disciplinary sanctions of those who are involved, as well as criminal proceedings according to the applicable anti- bribery laws.

The current Anti- Bribery policy is shared and available to all interested parties and it is periodically reviewed by the Company's Administration.

Athens 21st March 2023

The Anti- Bribery Compliance Officer
(ABCO)

The Chairman of the Board of Directors and
CEO

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