



Anti-Bribery Policy

HELLENIC WASTE RECYCLING S.A., operating in the field of **Collection and Transportation of Non-Hazardous Solid Waste and Cleaning Services**, is committed to the establishment, implementation, maintenance, and continuous improvement of an **Anti-Bribery Management System**, in accordance with the requirements of **ISO 37001:2016**.

The company is committed to maintaining **high standards of ethics, integrity, and responsible conduct**, and requires the Management, directors, senior executives, employees, business partners, and all interested parties with whom it cooperates to fully and without exception comply with this Policy.

At the same time, the company actively promotes a culture of integrity, ethical behavior, and transparency at all levels of its operations, reinforcing an environment of **zero tolerance toward bribery**.

All employees, including members of Management, have been trained in relation to this Policy.

Our company:

- ✓ **Prohibits bribery.** Any involvement in bribery, corruption, facilitation payments, or any other illegal act shall result in the termination of the business relationship.
- ✓ **Does not cooperate with organizations involved in corrupt practices** and immediately terminates any relationship with customers or other interested parties should such cases arise.
- ✓ **Complies with applicable anti-bribery legislation** and requires full compliance from all interested parties.
- ✓ **Systematically assesses bribery risks** related to its activities, business partners, and operating environment, and accordingly adapts its control measures and procedures.
- ✓ **Establishes anti-bribery objectives**, which are reviewed annually in terms of their level of achievement and, where necessary, newly approved or revised, taking into account company performance, operational changes, and new conditions within its field of activity. During the establishment and review of objectives, the company considers environmental, social, and other external factors, including climate change issues, within the framework of bribery risk assessment.
- ✓ **Is committed to meeting the requirements of the Management System** and to its continuous improvement.
- ✓ **Encourages the reporting of concerns in good faith or based on reasonable belief**, ensuring confidentiality and protection from retaliation.
- ✓ **Implements whistleblower protection mechanisms**, ensuring that any employee or business partner who reports concerns in good faith is fully protected from any form of retaliation.

When **business partners or other interested parties represent our company**, they are required, within the framework of their contractual obligations, to agree to comply with this Policy. All fees, payments, and expenses must be **lawful, reasonable, properly justified, and supported by appropriate documentation**.

Conflicts of interest are not acceptable.

As a condition of employment, Management and employees are not permitted to engage in private business activities, political activities, or charitable actions on behalf of the company without the prior **written approval of the Chairman and Chief Executive Officer**. It is a contractual requirement that **all contractors and other interested parties disclose to the company — prior to representing it in any manner — any actual or potential conflict of interest** with a specific customer or other interested party, or any involvement in bribery-related situations.

The company applies procedures for the **identification, declaration, assessment, and management of conflicts of interest**, ensuring that any potential or actual conflict is addressed with transparency and objectivity.



The company permits only the acceptance and offering of **low-value gifts and hospitality**, where this is reasonable and proportionate within a business relationship. Gifts and hospitality must be avoided where there is a risk that they could be perceived as influencing decision-making.

Directors, employees, and contractors use **confidential reporting channels** to raise concerns or submit complaints. All members of Management are informed of how reported concerns are handled, and it constitutes a serious disciplinary matter to fail to report or investigate such concerns. Under no circumstances shall any form of retaliation occur as a result of using the reporting channel.

The Anti-Bribery Management System in accordance with ISO 37001:2016 has been implemented to prevent the company from engaging in any form of corrupt activity and to ensure that cases requiring further investigation and action are properly identified and addressed. This system is fully supported by senior management.

The Chairman and Chief Executive Officer is regularly informed of all matters related to the Anti-Bribery Management System, and the Policy and procedures supporting the system are reviewed at least annually.

Senior Management is committed to actively promoting a culture of integrity and zero tolerance toward bribery, serving as a role model of ethical conduct throughout the organization.

Senior Management appoints and ensures the **authority and independence of the person responsible for the Management System** and commits to supporting the effective implementation of the Anti-Bribery Management System in accordance with this Policy and the established objectives, in order to adequately mitigate bribery risks for **HELLENIC WASTE RECYCLING S.A.**

The Compliance and Anti-Bribery Investigation Committee is responsible for providing clarifications, responding to inquiries, and promoting the resolution of issues related to bribery, in accordance with the procedures of the Management System.

The company ensures that the **Management System Officer and the Compliance and Anti-Bribery Investigation Committee are provided with the required independence, adequate resources, and direct access to Top Management**, enabling them to effectively perform their duties and support the continuous improvement of the Management System.

This Policy is **communicated internally and externally**, ensuring that customers, business partners, interested parties, and employees are informed of the company's commitment to the prevention of bribery.

Communication Channels

At HELLENIC WASTE RECYCLING S.A., we are committed to consistently applying this Policy.

We make every effort to ensure that communication channels remain available and accessible at all times.

For any concern, report, or complaint related to bribery-related matters, interested parties may contact us via email at: **Report.hellenicWrecycling@gmail.com**.

It is noted that reports may also be submitted anonymously, in order to ensure full freedom of expression.

President & Managing Director

Date

01/12/2025

