



12. Anti-Bribery Policy

12.1 Introduction

According to the Law 4557/2018, as currently in force, bribery and bribe-taking fall into the category of basic offences that constitute criminal activity, for the purposes of the above law, in relation to the prevention and suppression of money laundering and terrorist financing.

The purpose of the law is the prevention and suppression of crimes of money laundering and terrorist financing, which also include the above basic offences and the protection of the financial system from risks that arise by these criminal activities. The ultimate objective of illegal trafficking of funds through the financial system is to legalize such funds. Money laundering is also understood when the activities took place in the territory of another State, in so far as they would be a main offence if they were committed in Greece and are considered criminal, in accordance with the law of that State.

12.2 Policy

Taking into consideration the above as well those defined in L. 2656/1998 (Government Gazette Issue A 265) «Ratification of Agreement for the prevention and suppression of bribery of foreign public officials on international business transactions», PFH has adopted a respective policy to prevent and deal with bribery, bribe-taking and corruption incidents between its officials and any third party.

PFH Group makes clear that such practices are completely unacceptable with regard to business integrity and damage its reputation and interests. It further declares that it takes the necessary measures to prevent bribery, bribery-taking and corruption between its staff, its executives and any third party, but also applies accountability to all parties involved, should they be identified.

12.2.1 Field of Application

This policy applies at Group level. In this context, the Company has adopted appropriate measures to protect the reputation of the market in matters of ethical conduct, financial integrity and reliability of its officials.

12.2.2 Terms of Application

Recognizing that staff involvement in incidents of bribery may damage its public image and reputation, PFH Group proceeds to the following:

- Notification of the adoption and application of a policy against bribery and development of appropriate procedures for its implementation.
- Training of all employees and managers for the recognition and avoidance of any such involvement in bribery or bribe-taking.
- Encouragement of employees and directors for the awareness and prompt reporting of any case in which bribery or bribe-taking is suspected within the administration of PFH, while ensuring that any confidential information is treated with due confidentiality and care through the implementation of the Whistleblowing Policy.
- Clear notification that, where deemed necessary, the competent judicial authorities will receive immediate knowledge of the bribery or bribe-taking.
- Undertaking immediate legal action against those involved in documented cases of bribery or bribe-taking.
- Implementation of the transaction transparency policy.
- Implementation of policy and procedures for contract agreements and provisions that cover all stages of the process from the submission of competitive offers to the signing of the contract.
- Definition of a clear operational framework and adequate segregation of duties among its officers.

In addition, PFH Group has already established a Code of Conduct and Ethics for its employees, to which internal rules of professional ethics and conduct are defined and are applied to all staff. Also, regarding employment contracts concluded between the employees and managers and Piraeus Financial

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Holdings, it is explicitly stated that staff must not receive gifts, discounts or fees and other benefits from Group's clients or from third parties for services offered.

12.2.3 Scope

PFH explicitly prohibits the offer or provision of any incentive for the acceptance or rendering of bribery either in cash or other goods to and from any natural or legal person or scheme or entity, wherever residing, as well as to and from any natural person or entity who holds a public office with the purpose of gaining any commercial, contractual or regulatory advantage for the Company or acquiring any personal gain, financial or otherwise, for a natural person or other persons associated with it.

The anti-bribery policy prohibits the offering/acceptance of any allurements that could lead to the personal gain or advantage either of those receiving the lure or of any other individual or entity associated with them that can affect persons who make decisions or persons connected to them.

12.2.4 Exceptions

The above policy excludes the following standard practices/conduct:

- The usual and accepted hospitality.
- The offer of a customary gift on a ceremonial occasion, celebration or a special event, the value of which must not exceed in any case €100.00.
- The use of easily identifiable procedures for the payment of fee or indemnification.
- The offer of resources for the assistance of a person or body, in order to contribute to the efficiency of a particular assignment/project and which is provided only for that purpose.

A detailed description of the above is provided in the policy of conflicts of interest, as already adopted and implemented by PFH Group.

12.2.5 Reporting

The prevention, detection and reporting of bribery is the responsibility of all employees and management of PFH and its Group companies, as detailed in the Whistleblowing Policy. For the purposes of the foregoing, PFH has established appropriate communication channels for those reporting on cases of bribery, bribe-taking, corruption and fraud or for any potential suspicion, with the utmost confidentiality so as to immediately inform the competent authority. Upon authorization of the PFH Audit Committee, Internal Audit manages confidential reporting by staff on issues of bribery, bribe-taking, corruption, and fraud.

If there is any suspicion of bribery of an employee or manager of PFH or its Group companies, the Internal Audit must be informed immediately with diligence and with confidentiality so as to look into the matter. The Management will proceed to the necessary actions following Internal Audit's investigation in order to protect the reputation of PFH and its Group companies and officers.

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