

POLICY – ANTI-CORRUPTION

1. Compliance and governance

1.1 Anti-bribery and anti-corruption management

1.1.1 Introduction

Infinitem is committed to conducting its business ethically and in accordance with all applicable laws and regulations in the countries where it operates.

Infinitem advocates for a zero-tolerance policy against bribery and corruption. All employees and related third parties are strictly prohibited from:

- Making or accepting bribes.
- Making facilitation payments.
- Involvement in any form of corruption.

This policy outlines the company's stance against bribery and corruption and provides guidelines to ensure that all employees and business partners act responsibly and with integrity.

1.1.2 Scope

It applies to all employees (permanent, fixed-term, or temporary), directors, officers, consultants, contractors, suppliers, and any other person or entity associated with Infinitem, including third parties and business partners.

1.1.3 Definitions

Bribery: The offering, promise, giving, accepting, or soliciting an advantage as an incentive for an act that is illegal or a breach of trust.

Corruption: Illegal and inappropriate conduct intended to secure a benefit for oneself or another related to the conduct of the business.

Facilitation Payments: Small, informal payments made to secure or expedite routine actions by an employee.

1.1.4 Compliance with Laws

Infinitum strictly adheres to all laws and regulations regarding the fight against bribery and corruption. This includes compliance with local anti-bribery laws and international corruption laws and regulations within the EU, and respects anti-corruption conditions as set out in contracts with US-based manufacturers, including adherence to the FCPA.

1.1.5 Prohibited behavior

Infinitum prohibits:

- offer, promise, give or receive any bribe, either directly or indirectly.
- use other avenues or channels to provide or receive anything of value to obtain or maintain business activities or an advantage in the conduct of business.
- making facility payments aimed at speeding up or securing the execution of a routine action.

1.1.6 Gifts and hospitality

Infinitum recognizes that offering and receiving modest gifts and hospitality may be standard practice in the business sectors in which it operates. However, gifts and hospitality must:

- They are given openly and transparently.
- Be properly registered in the company's books.
- are strictly in accordance with the set limits set out in this policy.
- Don't be overpowering or rich.
- Not to exceed the amount of €100 per case without prior approval by the General Manager or the Chief Executive Officer.
- Not to exceed the annual amount of €1,000 per customer account without the prior approval of the General Manager or the Chief Executive Officer.

1.1.7 Responsibilities of employees and management

- **Employees** are required to ensure their understanding and compliance with this policy. Any violation of the policy must be reported promptly through the channels designated by Infinitum.
- **Management** has a special duty to lead by example, promote an anti-corruption culture within the company, and monitor adherence to the policy in all its departments.

1.1.8 Training and communication

Infinitum provides training on this policy as part of the onboarding process for all individuals joining the company and annual training for existing staff. The policy and related procedures will be communicated to all staff at the start of their employment and thereafter annually through trainings.

1.1.9 Monitoring and review

The effectiveness of this policy will be reviewed annually and will be subject to audits and compliance audits. This will ensure effective implementation of the policy and identify any need for amendments or improvements.

1.2. Compliance management

1.2.1 Introduction

Infinitum is committed to conducting its activities in accordance with the highest ethical and legal standards. This policy outlines our approach to ensuring compliance with all applicable laws and regulations and outlines the responsibilities of our staff and management to uphold our organizational values.

1.2.2 Scope

It applies to all employees, directors and officers within Infinitum, as well as any third parties involved in business relationships with us.

1.2.3 Definitions

- **Compliance:** Compliance with the laws, regulations, and company policies that govern our business practices.
- **Bribery:** The offering, promise, giving, accepting, or soliciting an advantage as an incentive for an act that is illegal or a breach of trust.
- **Corruption:** Illegal and inappropriate conduct intended to secure a benefit for oneself or another related to the conduct of the business.

1.2.4 Compliance obligations

Infinitum is committed to:

- We comply with legal standards and adhere to all regional and international laws applicable to our operations.
- It carries out only transparent and documented business transactions to prevent and detect cases of bribery and corruption.
- It reviews and updates internal policies annually to align with current legislation and best practices.

1.2.5 Roles and responsibilities

- **Chief Executive Officer and Board of Directors:** They provide the strategic direction and necessary resources to support compliance initiatives, set an example of ethical and ethical conduct, and ensure that the company's strategic decisions are made in accordance with applicable legal and regulatory requirements.
- **Senior Management:** They are responsible for promoting and implementing compliance policy in their areas of responsibility, facilitating relevant employee training, and monitoring day-to-day operations to ensure alignment with legal and regulatory standards. In the absence of a dedicated Compliance Officer, they act as a point of reference for compliance issues.
- **All employees:** They must understand and comply with this policy and related procedures, as well as promptly report any suspicious activity or potential compliance violation through the designated reporting channels.

1.2.6 Training and communication

- Infinitum will conduct annual compliance training sessions for all employees to enhance their understanding of the legal and ethical obligations under company policies and the law.
- New recruits will receive special training as part of their onboarding process.

1.2.7 Monitoring and review

- The CEO, supported by senior management, will conduct an annual review of this policy to ensure its effectiveness, making adjustments as needed based on operational feedback and changes in legal requirements.

1.2.8 Reporting of violations

- Employees are encouraged to report any instances of non-compliance to their immediate supervisor or directly to the CEO.
- All reports will be treated confidentially, with no retaliation against the person making the report.

1.2.9 Disciplinary measures

- Failure to comply with this policy can lead to disciplinary action, up to and including termination of employment.
- Legal proceedings can be initiated for violations involving criminal activity.

1.2.10 Observance

- Accurate records of all business transactions must be kept to demonstrate compliance with this policy and applicable laws.

For and on behalf of INFINITUM S.A.

INFINITUM A.E.
INFINITUM - ΣΥΣΤΗΜΑΤΑ
& ΥΠΗΡΕΣΙΕΣ ΠΛΗΡΟΦΟΡΙΚΗΣ
ΑΝΩΝΥΜΗ ΕΜΠΟΡΙΚΗ ΕΤΑΙΡΕΙΑ
ΛΕΩΦ. ΑΜΑΡΟΥΣΙΟΥ 7, 14123, ΛΥΚΟΒΡΥΣΗ
ΤΗΛ: 213 0180000, ΦΑΞ: 213 0180082
ΑΦΜ: 099995491 - ΔΟΥ: ΚΕΡΔΟΒΕΒΑΤΙΚΗΣ
ΑΡ.Μ.Α.Ε 44655/01Α/Β/99/443
ΑΡ.ΜΗΤΡΩΟΥ ΠΑΡΑΓΩΓΩΝ:00482
ΑΡ. Γ.Ε.ΜΗ: 3610101000

Antonia Kariotoglou
President and Managing Director

