



BRIBERY PREVENTION POLICY AND BRIBERY COMPLIANCE HANDBOOK ACCORDING TO ISO 37001:2016

This Document should be treated only in the manner of ISO 37001:2016 and only for the operations of Euroins AD Branch Greece

INFORMATION CARD

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1. Why is this policy important to you and to the business?

This Bribery Compliance Policy and bribery Compliance Handbook ("Policy") describes the EUROINS's AD BRANCH GREECE policy requirements and procedures to ensure compliance with applicable legislation to combat corruption. It is important to examine and adhere to the principles outlined in this policy for the following reasons:

- To act in accordance with the values of EUROINS AD Branch Greece
- To protect the reputation of EUROINS AD Branch Greece
- To demonstrate the EUROINS's AD Branch Greece commitment to the communities in which it operates
- To ensure compliance with any applicable anti-corruption legislation applicable to EUROINS AD Branch Greece and
- To strengthen national enforcement and awareness of anti-bribery laws.

2. How to Observe the Policy and how to use this Handbook

In order to ensure proper compliance with this Policy, you must remember the following rules:

Participation in all compulsory education programs

EUROINS AD Branch Greece organizes compulsory education programs on a yearly basis to ensure that employees understand any applicable legislation to combat corruption and act in accordance with that legislation.

These training programs were drawn up by the Top Management with a view to specific risks faced by each EUROINS's AD Branch Greece Department. It is essential for everyone to participate in the specific training programs.

Ensure approval

In the context of the Policy, certain actions - in particular the provision of any value object - require the prior written approval of the Legal Advisor of EUROINS AD Branch Greece.

Copies of these approvals must be kept by the Chief Executive Officer and made available to auditors or investigating persons, if required.

In the case of doubt, ask for guidance

If you are not sure how to respond to a situation or whether a certain behavior may be inappropriate or contrary to the Policy, you should always ask for guidance from the Branch's Executive Director before you act.

Explaining concerns

If you see behavior that concerns you or which may be a violation of the Policy, you must report the issue immediately to the Branch's Executive Director. This will give the Company the opportunity to deal with the issue and correct it, ideally before it becomes a breach of the law or at risk for the Company's good reputation.

Serious suspected violations of the Policy, such as those involving executives in key positions of the company, significant amounts or possible criminal activities, should be reported directly to the CEO.

Example: A financial officer was instructed by his supervisor to execute a transfer of funds to the personal bank account of a state official / senior executive of our Customer company. When the employee asked his supervisor what the purpose of the payment was and if he had been approved by the Chief Executive Officer / BoD. to make the payment, the boss replied: "Look at your job."

When he addressed his concerns, the boss told him that he did not care what the Policy says and that he would take full responsibility if any problem with the payment arises.

The employee is afraid that his supervisor will retaliate against it if he mentions the matter.

The Right Response: The financial department employee must report the situation to the CEO immediately. If he performs the command of his superior and violates the Policy, they will both have violated the Policy and possibly the law. The Company will protect the employee from any retaliation measures for his behavior.

You will never be penalized for refusing to bribe

No worker will ever be sanctioned through performance appraisals, pay or any other method because he refused to bribe. Similarly, professional performance will not be adversely evaluated due to delays or financial losses due to your refusal to bribe. However, planning is included in a worker's fair assessment; therefore, you must always plan in advance so that you do not face a situation in which someone asks you for a refund in order to expedite a request.

Report to Public Authorities

EUROINS AD Branch Greece employee is able to report bribery to a Public Authority without being restrained from EUROINS AD BRANCH Greece.

Application

The Company applies a "zero tolerance" approach to breaches of this Policy. All employees are required to abide by the ethical standards of the Policy and must take responsible measures to prevent any violation of the Policy. Validation in the event of a violation of this Policy or failure to report any violations that come to your attention is a reprimand and / or dismissal.

Infringements may also be reported to law enforcement agencies and may involve criminal proceedings against you. Bribes are an offense punishable by multiple years of imprisonment.

Who does this policy apply to?

The Policy applies to anyone working in the Company regardless of place, place or degree of seniority, including all employees, directors and members of the Company's Board of Directors. We require temporary and contractual employees, delivery vendors, suppliers, subcontractors, joint venture partners, consultants and any other third party acting on behalf of the Company to comply with the principles of the Policy.

Each partner of a consortium must adopt a similar policy to combat corruption. When we participate in a syndication scheme but do not control it, we urge our partners to meet the requirements of the Policy both in the work of the consortium and in their own work.

What is Bribery

"Bribery" is the provision or offer of any value object or any advantage, directly or indirectly, to any person in order to induce that person or any other person to perform a function or activity improperly.

Bribery is also the search for or the taking of any object of value or any advantage, directly or indirectly, by any person, with the purpose, as a result, of performing the function or activity in an improper manner by you or by another person. You should never be involved in bribery.

Payments and activities used in bribery

A bribe may be financial or non-financial and may involve the provision or receipt of money, loans, contributions or donations, travel, job offers, refunds, reductions, goods, services, or anything else that may be considered valuable. Gifts or entertainment can be considered bribery under certain circumstances. A bribe can also take the form of a "reward" and be paid after the incompetent performance of the duty or obligation has been completed.

Bribery in relation to state officials

Although you should never attempt to bribe anyone or bribe anyone, you must be very careful not to be involved in any bribery or inappropriate transactions with state officials. Do not offer, promise, give or permit any value item, any financial or other benefit to anyone (including family members, relatives or persons related to a state official) if the circumstances may give the impression that you are seeking to ensure its influence government official to achieve or maintain a business partnership or an advantage in doing business.

1. Who is a "state official"?

Government officials include the following persons:

- Representatives of any government, state or state-controlled entity anywhere in the world, including both high-ranking and low-ranking officials. State and government-controlled entities include, but are not limited to, central banks, government investment funds, state hospitals and other enterprises owned or controlled by a state entity.
- Any person exercising a legislative, administrative or judicial function, regardless of whether he is appointed or elected
- Any candidate for public office or public office - Any political party executive
- Any executive, employee, representative of a public international organization such as the United Nations or the World Bank
- Any member of a royal family and
- Any child, spouse, parent, brother / s or other relative of the above mentioned.

You are responsible for understanding whether a person you deal with is a state official. If you are in doubt, consult the CEO.

2. Exercising influence on the decision of a state official to secure an advantage.

Bribery is also the provision or offering of any value item or any advantage to a state official in order to influence a decision that falls within the discretion of the official, such as the outcome of a state control or inspection, the decision to award or continue professional relations or the training or the adoption of tax or other legislation. Similar offers to a person who is not a state official

It is also forbidden if you have any reason to believe that they are intended to benefit a state official. This category also includes relatives and close friends of the state official.

Transactions with state officials

A. Offering hospitality to state officials

You should not offer gifts or hospitality to a state official in return for any advantage, favorable treatment, or influence on any government decision. However, hospitality aimed at establishing good relations with a state official, which is reasonable and proportionate, is permitted provided that

- (1) You have obtained prior written approval from the Chief Executive for the expense as per the requirements of the Outstanding Reports and duties payment of Euroins AD Branch Greece Directive, and
- (2) Keep all relevant records for each such expense.

It is important to remember that the more luxurious the hospitality or the expense is, the greater the suspicion that it is intended to induce or reward inappropriate execution or influence by the employee. Therefore, any gift, meal or other hospitality provided to government officials must be reasonable.

1. Gifts

In some rare cases, small gifts can be given to state officials, but only to the extent that this is reasonable and appropriate and only for legitimate business purposes. You should not give gifts to a state official who may be affected by a pending or ongoing case involving the Company. Never give gifts to anyone, either directly or indirectly, even if these gifts are permitted under local law or accepted in accordance with local practice.

Always ensure prior written approval from the Chief Executive Officer before giving a gift to a government official and keeping all relevant records regarding such costs.

2. Meals

You can invite a state official to a meal, but only if it is reasonable and appropriate. You can not invite a state official to a luxurious or exaggerated meal. You must always obtain the prior approval of the Legal Advisor before offering any hospitality to a government official and keep all relevant records relating to such expenses.

3. Travel and accommodation

The Company does not pay travel expenses, such as air tickets, hotel accommodation or government officials' meals, unless the expenses are permissible as described above. You must obtain prior approval from the Chief Executive Officer before agreeing to pay such costs for a government official and to keep all relevant records relating to these costs.

In addition, these costs must be communicated to the employer of the State official before they are incurred. The Company and its employees should never accept a request to keep confidential such payments or refunds. Travel and accommodation costs must be limited in accordance with the travel restrictions of the state body itself.

Travel and accommodation costs must be paid directly to the third party. In some cases, where direct payment to the third-party provider is not possible, payment can be made directly to the state official's employer. You should never provide funds for travel and stay directly to the state official unless exceptional circumstances are forthcoming, and you have obtained prior approval from the Chief Executive Officer. Daily payment to the state official is forbidden.

4. Entertainments

The Company should not offer entertainment to state officials nor pay the costs associated with a state official's recreational activities. This should happen only if such costs are reasonable and

appropriate in the circumstances, are not excessive, are permitted under the employer's regulations the state officer or the applicable jurisdiction rules and are carried out in the context of a business purpose. You must obtain prior written approval from the Chief Executive Officer before making any such expense and keep records of such costs.

5. Events

You are allowed to call a state official at a separate event, e.g. a sporting event to promote good relationships with the official, if the event is not luxurious, the expense is reasonable under the circumstances and the purpose of the invitation is not to urge the officer to act in a discriminatory or inappropriate manner for the Company. You must receive prior written approval from the Chief Executive Officer before providing a state official with tickets at a separate event. You should also keep records of such expenses.

B. Political Contribution

You must obtain written approval from the Company's Board of Directors before allowing or making a political contribution to the Company's name.

C. Charitable contributions and Sponsorships

In the framework of our commitment to functioning as good corporate / social citizens, the members of the Board of Directors are allowed to make charitable contributions. Such contributions may take the form of goods or services, technical assistance or training, financial support or sponsorship of events. However, particular care must be taken to ensure that the charitable organization is in good faith, regulated and supervised as such in its jurisdiction, and that there is no reason to believe that the charity operates for the private benefit of any state official.

If any government official is a member of the board of directors or a charitable organization, you must inform the Management Director, who will inform the relevant executive investigation officer or other procedures which are required to ensure a high level of certainty that the levy will not be used to make any prohibited payment.

D. Official Approvals & Licenses

You should not make payments or provide any other advantage to government officials beyond what is required by law or local regulations to ensure the approval of licensing studies (static, engineering, etc.), energy certificates or other necessary approvals. Everyone should be careful on suggestions by inspectors / engineers of government agencies and services.

To avoid such situations, you must:

- Be aware of the conditions for granting the license and the progress of the Company in fulfilling these conditions
- solve problems by providing sufficient time to secure the license when you are not under pressure
- Establish good relations with authorities
- Make it clear that the Company cannot bribe or bribe in its transactions
- Work with others in the industry who face similar problems and apply similar ethical standards
- Make sure you understand the structure of the relevant regulator well enough to be ready to appeal to a senior state official to solve the problem and
- Be ready to explain why the Company should receive permission.

E. Inspections & Fines

You should not make payments or provide any other advantage to government officials in order to avoid an inspection, to influence the results of an inspection or to avoid a fine.

How to behave

During an inspection, you must treat the state official with kindness, but you must not offer him any value object or any advantage before, during or after the inspection. Such an offer, even if it is too small, can be interpreted as an effort to influence the officer's conclusions with regard to the inspection.

How to avoid such situations

To avoid such situations, you must:

- Prepare for the inspection in advance so that the state official cannot make any valid complaints about the design and execution of the project
- Know the local rules and regulations
- To inform the employees in the relevant state service;
- If you suspect that an inspector may ask you to bribe him / her, you must ask other persons to accompany you during the inspection because the presence of other persons may discourage him from asking to bribe.

Control required when recruiting or collaborating with third parties

The Company may be held responsible for acts of bribery of third parties acting on behalf of the Company or for bribery of employees or other persons performing services for the Company.

Therefore, you should never allow or require any employee or third party to bribe anyone (including state officials) or accept bribes from anyone.

Similarly, you may not disregard any third-party activity acting on behalf of the Company that you suspect may be in conflict with this Policy. You must immediately report the issue to the CEO.

You must be very careful when evaluating a prospective employee or third party who may act on behalf of the Company, especially if that person will interact with government officials on behalf of the Company. You must obtain prior written approval from the Chief Executive Officer before hiring a third party who may interact with government officials on behalf of the Company. You should not hire a worker, a third person or a counselor if you have good reason to believe that this person may attempt to bribe anyone.

New employees and third parties who are hired by the Company should receive a copy of this Policy and be informed that they are required to comply with it.

Examples of third parties and other intermediaries

The following categories of persons may be considered as third parties who perform services for the Company and whose actions may be attributed to the Company:

- Contractors, Suppliers, Dealers
- Advisers or other intermediaries, persons who offer business opportunities to the Company
- Law firms or legal counselors
- Subsidiaries.

Checks are required when recruiting workers or third parties

In order to ensure that there are no bribery cases, caution and control are required before hiring employees or choosing third parties to act for the Company.

You only have to deal with people or businesses that are qualified and well-known. To ensure this, you need to identify candidates' qualifications and legitimate professional reasons for selecting the candidate, interviewing, meeting with the candidate, and exploring the candidate's reputation in the industry.

If the person or business comes from a high-risk country where bribery is known to be commonplace, your research about that person or business should be very detailed. You must check and make sure that the candidate has no family or other relationship with government officials who are competent in areas related to the candidate's potential job. The recruitment of such a person / company may give the impression that the Company is trying to secure an inappropriate advantage.

Each stage of the audit investigation must be documented. You must also ensure that the fee is reasonable in relation to the services.

Important fact:

During the audit process, you should pay attention to the following indications that may indicate that the potential worker or third party should not be hired:

- Request or requirement for unreasonably high salary or pay
- Inappropriate payment method request, for example, request for indirect payment of payments in a country other than the one in which the entity operates, cash payments or

payments to a numbered account without a beneficiary name or to a secret account or to a third-party account

- Unwillingness to sign a contract
- Promising unusually fast results
- Apparent lack of qualifications or experience for position or role
- Old categories or incidents of improper business practices
- Unwillingness to provide any requested information or
- A request for payment or gift to the same or another person.

If your audit reveals anything suspicious, you must ask for assistance of the Legal Advisor and the BoD. to resolve your concerns before hiring the employee or the third person.

As regards third parties, the control obligation does not end with the selection and recruitment of the third party. You must keep track of the Company's relationships with third parties and perform periodic audits on every third party you hire.

Conventional clauses

All employees must sign a statement stating that they have read and understand the Policy and that they agree to abide by it. The Acknowledgement Letter is attached as Appendix, as well as the Employee Declaration of Criminal Conviction.

Similarly, you should never establish a relationship with any third party if he does not sign a contract that contains provisions under which the third party is not involved and will not be involved in bribery.

Hosting offer from, customers, suppliers and other business partners

A. Gifts, meals and entertainment

The exchange of gifts, meals and entertainment with customers, suppliers and other business partners is often commonplace. A crucial element in these exchanges is to maintain an equal relationship. You must avoid luxurious gifts, meals or entertainment that may give the impression of inappropriate influence. You should always consider whether the gift, meal or entertainment you provide or will receive may be considered excessive or inappropriate or may imply any obligation.

Receive gifts, meals or entertainment

- Do not accept gifts, meals or entertainment in exchange for doing or promising to do anything for a customer, supplier or other business partner.
- Do not ask for gifts, meals or entertainment from a customer, supplier or other business partner.
- Do not accept gifts in cash, e.g. gift cards, under any circumstances.
- Do not accept luxury gifts, meals, or entertainment. In this area, your judgment is crucial. For example, a small gift during the holiday season from a vendor, according to the local habit, is not usually a problem.

- Contrariwise, an expensive trip during the weekend is not allowed. It is often difficult to determine what is excessive, and what is customary or likely varies from country to country. In some cases, individual small gifts can be considered excessive due to their total value and relative conditions. In case of doubt, always request the prior written approval of the Legal Advisor.
- Symbolic gifts, such as awards and statuary in recognition of a business relationship, may be accepted.

If you are offered gifts, meals or entertainment that go beyond the guidelines outlined above, kindly refuse and explain the Company's rules.

If the conditions under which it was given impede its return, you must notify the Chief Executive Officer who will work with you to donate the object for charity or to distribute or drag the object between a larger group of employees.

Providing gifts, meals, or entertainment

- Gifts and entertainment to customers, potential customers and suppliers must support the legitimate business interests of the Company and must be reasonable and appropriate in the light of the circumstances. You must always keep in mind the rules of customers and suppliers regarding the reception of gifts and entertainment. In case of doubt, always request the prior written approval of the Legal Advisor.
- Cash should never be provided as a gift.
- You must keep records of any such expense.

Events

You are allowed to call a customer, supplier or other business partner to a separate event if you do not intend to invite that person to act in a discriminatory manner or to perform his duties improperly.

For example, you are allowed to invite a customer to attend a separate public relations event to establish good relationships.

B. Travel and accommodation

The Company does not pay or refund travel expenses, such as air tickets, hotel accommodation, meals or other incidental costs of customers, suppliers or other business partners, unless the costs are permissible as described above. Such costs must be disclosed to the person's employer before the expenditure is incurred. The Company and its employees should never accept the request to keep these payments or confidential repayments. Travel and accommodation costs must be limited and reasonable.

Travel and accommodation costs must be paid directly to the third party. In some cases, where direct payment to the third party provider is not possible, payment may be made directly to the employer of the person concerned. You should never provide funds for travel and stay directly to the person concerned except in exceptional circumstances and only after obtaining prior written approval from the Legal Advisor. Daily compensation for the costs incurred by the person concerned is forbidden. You must keep records of all related costs.

Business & Finance Archives

All payments and charges must be fully and accurately recorded in accordance with the applicable Accounting Policies and the Company's Policy.

For example:

- Gifts
- Travel and entertainment expenses
- Charity Contributions
- Expenditure on sponsorship
- Political contributions
- Payments to third parties, suppliers and service providers.

DISCIPLINARY POLICY & WARNINGS

ON THE ANTI-BRIBERY POLICY COMPLIANCE

1.1 Objective of Disciplinary Policy:

The objective of the disciplinary policy is to establish reasonable and consistent standards of behaviour contributing to effective implementation of the ISO 37001:2016 Standard requirements and the Anti-Bribery Policy of Palau International Ship Registry.

The aim of Disciplinary procedure is to help and encourage all employees to achieve and maintain the expected compliance with the standard of conduct and attendance to ensure that any breaches are dealt with fairly, consistently and as quickly as possible through the disciplinary procedure.

1.2 Scope:

This policy applies to all employees of EUROINS AD Branch Greece regardless of work position or location.

1.3 Key principles:

- Compliance Officer and Human Resource Officer should act as a facilitators and advisors in both formal and informal proceedings, always reporting to CEO.
- Issues should be solved quickly and, wherever possible, informally.
- The decision to invoke formal procedures will be taken by the CEO.
- Investigations will be conducted in a fair and objective way.
- All parties to any procedure, formal or informal, will keep complete confidentiality.
- Employees will be given fair hearing, may be accompanied at formal hearings, and have the right to appeal against a formal decision.
- Every opportunity is given to employees to explain the circumstances surrounding any alleged breach of rules.
- No disciplinary action will be taken until the issue has been fully investigated.

Company Personnel is expected to watch for any bribery cases and promptly report any concerns about bribery or possible violations of the Anti-Bribery Policy to the Compliance Officer, the Legal Advisor, or the CEO. Failure to report any suspected violations may be treated as Misconduct. EUROINS AD Branch Greece urges employees to trust their instincts in recognizing and acting upon legitimate concerns. EUROINS AD Branch Greece takes all reports of potential misconduct seriously. The Company will promptly investigate all reports to determine whether a violation of the Policy or the law has occurred and will take necessary remedial action. In case an employee is asked to participate in an investigation, he/she shall cooperate fully and answer all questions honestly. An employee's honest and good faith report or participation in an investigation cannot be the basis for any adverse employment action.

Within EUROINS AD Branch Greece, and regarding the compliance with the ISO 37001:2016 Standard and the Anti-Bribery Policy, there are two levels of disciplinary offence, Minor Misconduct and Major Misconduct. There may be a Direct Notice of Dismissal, which is applicable to all employees, no matter if they have accepted Anti-Bribery Policy or not.

a) **Minor Misconduct includes** (but is not limited) to,

- Non-reporting of incidents of attempted or suspected violation of the anti-bribery policy or anti-bribery management system
- Any act which does, or could, bring the company disrepute
- Refusal to participate in Anti-Bribery investigations, if requested
- Insubordination
- Insulting behaviour
- Breach of confidentiality
- Misuse or misappropriation of EUROINS funds.

b) **Major Misconduct includes** (but is not limited) to,

- Non-reporting of actual bribery incidents of violation of the anti-bribery policy or anti-bribery management system
- Violation of the anti-bribery policy or anti-bribery management system
- Theft, fraud or deliberate falsification of records, accounts, expense claims, timesheets, self-certification forms or any other document for Bribery scope
- Failure to comply with lawful and reasonable instructions regarding Anti-Bribery.

1.4 Informal Procedures:

Initial misconduct is normally dealt with in the first instance through informal discussion with a consultative approach. The Compliance Officer/HOD must take a note of these discussions, noting the date, circumstances and advice given, which should be then retained by the Compliance Officer/HOD for a period of SIX months. Employee should be provided with a copy of the notes. File notes should be forwarded to HR and the note will be retained on an employee's file.

Employee will be informed that there is a risk of formal disciplinary proceedings if no improvement is made.

1.5 Formal Procedures:

Where the nature of misconduct is considered to be more serious or employee's misconduct cannot be resolved through informal discussions (as above) Compliance Officer/HOD may choose to invoke the formal disciplinary procedure.

The Compliance Officer /HOD may hold an investigation before deciding to invoke formal proceedings. Alternatively, the Compliance Officer/HOD may gather evidence which will then be provided to the employee and HR before a formal disciplinary hearing.

The employee will be advised in writing of the alleged misconduct and possible consequences by HR.

1.6 The disciplinary Meeting:

HR will communicate with the CEO and confirm the disciplinary meeting details to the employee. A minimum of two working days' notice will be given of the meeting. A formal request for a deferment by the employee or their representative will not be refused unreasonably, but such a deferment will not normally exceed five working days.

Should an employee persistently decline to attend a scheduled meeting without a reasonable explanation, the meeting will be held in their absence and a decision taken on the basis of the information available. The decision will be confirmed in writing to the employee.

In order to maintain impartiality, the CEO will not have been involved in any earlier stages of disciplinary procedure.

1.7 Conduct of Disciplinary meeting:

The HOD will present their concerns and investigatory evidence.

The employee will be given an opportunity to answer questions and to respond to the allegations put against him/her.

The employee will be able to ask witnesses questions and also review witness statements.

Other witnesses may be interviewed at the request of the employee.

1.8 Right to be accompanied:

An employee can be accompanied by a representative who can address the meeting and make representations, but such representatives may not answer questions on behalf of the employee. An employee's representative may be a colleague but not anyone acting as a legal representative at any stage of the procedure.

Adjournments:

It may be necessary for the CEO to adjourn the meeting and undertake additional investigation in the light of evidence provided at the disciplinary meeting.

Disciplinary Outcome:

Within 5 days of a disciplinary meeting, Compliance Officer and CEO will provide a written report to HR outlining the main findings, the sanction(s); the standard expected from employee and the consequences of failing to meet those standards.

HR will communicate the decision and sanction to be taken (if any) including the timescales and duration of any sanctions and the likely consequences of any further misconduct along with the right of Appeal.

1.9 Disciplinary Warnings (Sanctions):

Warnings may be given at any level provided the alleged misconduct warrants such action. Subsequent warnings need not be for a similar offence, e.g. employee can receive a first Written Warning for Breach of confidentiality and a Final Written Warning for Non-reporting of actual bribery incidents of violation of the anti-bribery policy or anti-bribery management system.

1.9.1 First Written Warning

If following a Disciplinary meeting, conduct is considered unsatisfactory then a First Written Warning will be issued.

The Warning will state the reason for Warning and the required improvement in conduct, along with any training needs. It will also state that if there is no improvement then further disciplinary action will take place.

A copy of warning will remain on employee's personal file and will be removed after 6 months subject to satisfactory conduct.

1.9.2 Final Written Warning:

If the act of misconduct is very serious but does not amount to gross misconduct or if, following a First Written Warning, there is a further act of misconduct, the disciplinary procedure will again be invoked and if employee's conduct is considered unsatisfactory, then a Final Written Warning will be issued.

The Warning will state the reason for Warning and the required improvement in conduct. It will also state that if there is no improvement then further disciplinary action will take place, which may result into dismissal.

A copy of warning will remain on employee's personal file and will be removed at the end of 12 months subject to satisfactory conduct.

1.9.3 Length of Warnings:

Warnings will remain on employee's personnel file for 6 months in case of a First Written Warning and 12 months for the Final Written Warning. However, the company reserves

the right to issue a longer period for the warning if the circumstances warrant it, e.g. Where the conduct is satisfactory within warning period but lapses soon after.

1.9.4 Dismissal:

If, following a Final Written warning, there is a further act of misconduct, the disciplinary procedure will be again invoked and if the conduct is considered unsatisfactory, employee may be dismissed.

Dismissal is immediate with appropriate pay in lieu of notice.

In case of gross misconduct, dismissal will be immediate and without notice or pay in lieu of notice.

The reasons for dismissal will be confirmed in writing within 5 working days of decision and also include the right of appeal.

1.10 Suspension:

In case of alleged gross misconduct or where necessary to protect company interests, Company may suspend employee whilst investigations take place or disciplinary procedure is ongoing. In this event suspension will be confirmed in writing, and all terms and conditions of employment including pay will continue.

During any period of suspension employee will be entitled to access the company's premises or company equipment /networks or allowed contact with suppliers or contractors (unless employee has been given the authorization to do so) or other employees (other than chosen representative and those who are witnesses for employee).

The period of suspension will be reasonable and should, unless matters are complex, last no longer than 5 working days.

1.11 Appeals:

Employee has the right to appeal against any disciplinary decision. Appeals must be made within 5 working days of the date of receipt of the outcome and must be sent in

writing to the Compliance Officer and the HR, clearly stating the grounds for appeal. Employee will be given not less than 48 hours" notice in writing of the appeal meeting. Employee has the right to have a companion at the meeting and will have the opportunity to state his/her case. Any new evidence which employee wish to use should be sent to the Compliance Officer and the HR at least 24 hours before meeting. Employee will be notified of the outcome of the appeal in writing. The appeal decision is final.

1.12 Probationary period:

The disciplinary procedure applies during employee's probationary period. If employee commits misconduct during probation, company will impose same appropriate sanctions, which may include dismissal.

ANNEX I

Appendix A

Acknowledgement Letter According to Anti-Bribery Policy

Full Name:

Job Title:

Company / Department:

If you are unable to make any of the statements contained in this certificate in good faith, unconditionally and without exception, you should consult the Management Director.

I have read and understood the Anti-Bribery Policy and the Anti-Bribery Compliance Manual of EUROINS AD Branch Greece("Politics"). I am fully familiar with its content and agree to abide by and implement the provisions of the Policy as a condition for my employment / appointment / approval.

All EUROINS's AD Branch Greece employees, officers, directors, consultants, auditors, surveyors, representatives and any individual cooperating with EUROINS AD Branch Greece whatsoever who refer to me have been informed of this Policy and have received a copy of it.

I am not aware of the existence of any gift, offer, promise, agreement or authorization prohibited by the Policy nor the existence of any offence of accounting requirements, record keeping requirements or financial audit requirements which are referred in the Policy or the Code of Business Conduct.

I do not know any facts that constitute valid grounds for suspecting an offence of the Policy statement by any person who is subject to it.

Date:

Signature:

Appendix B

PROVISION FOR AGREEMENTS WITH THIRD PARTIES / CONTRACTORS

The confirms the receipt of the Anti-Bribery Policy and the Anti-Bribery Compliance Manual ("Policy") of EUROINS AD Branch Greece and agrees that he/she and all members of the BoD, executives, employees, suppliers, subcontractors, joint venture partners will comply, in fulfilling their obligations under the Contract, with the Policy as applicable to third parties.

Date
Signature