



TURN Key
SOLUTIONS



Anti-Bribery / Anti-Corruption Policy

Bribery and corruption represent major threats to good governance, sustainable development, business ethics, and good faith among business partners. They undermine efforts to achieve economic growth.

Cosmos Business Systems (hereinafter referred to as Cosmos or the "Company") operates with zero tolerance for incidents of bribery and corruption. The Company operates based on ethics and integrity. The management of Cosmos is committed to contributing in any way possible to the prevention and combat of bribery and corruption. It also aims to ensure that all its partners apply best practices.

Corruption can be defined as the abuse of entrusted power for personal gain. The benefits may be financial and/or non-financial and may take many forms. The detection of such incidents is not always easy. Therefore, the contribution of everyone in combating such phenomena is necessary.

This policy is not intended to prohibit hospitality and/or entertainment practices, which are proportionate, properly recorded, and legal in the jurisdiction in which they occur. Practices aimed at creating or strengthening relationships and promoting Cosmos' objectives must be carried out with transparency and must not create any expectation on the part of the recipient to reciprocate, either by taking action or by omitting any action, in return.

It should be noted that Cosmos DOES NOT differentiate between facilitation payments and bribery. Both are expressly prohibited, even if a payment is small or considered acceptable according to local customs and traditions. The term "facilitation payment" typically refers to situations where a small amount of money is offered to an employee to ensure or expedite the performance of a routine or necessary action, which the person making the payment is legally entitled to.

Cosmos DOES NOT make donations to political parties.

Every member of Cosmos, both employees and associates, must oppose incidents of bribery and corruption and report any suspicious cases related to such phenomena.

Specifically, if you have any doubt about how to react in a situation or whether a certain behavior may be inappropriate or contrary to this policy, you should seek guidance and advice from the Compliance Officer (Ms. Dimitra Efthymiou). You may also submit your questions via email to anti-bribe@cbs.gr.

If you observe non-compliance with the provisions of this policy or anti-bribery laws, you must submit the relevant report, either anonymously or with your name. The company encourages responsible reporting made in good faith and with professional integrity. Specifically, reports can be submitted as follows:

ATHENS

44, P. Bakogianni Str.
Metamorfofi - 14452
Athens, Greece
Tel.: +30 210 6492800
Fax: +30 210 6464069
email: cosmos@cbs.gr
www.cbs.gr

Registration Number:
000412401000

THESSALONIKI

9th km Thessaloniki - Thermi
Pylaia Thessaloniki - 57001
Greece
Tel.: +30 2310 477670
Fax: +30 2310 477672
email: cosmos.thess@cbs.gr
www.cbs.gr

CRETE

36, Sfakion Str.
Chania - 73134
Crete, Greece
Tel.: +30 28210 46857
email: gekosp@cbs.gr
www.cbs.gr

CYPRUS - CBS IT

81, Kennedy Ave.
Nicosia - 1076
Cyprus
Tel.: +357 22442101
Fax: +357 22313840
email: sales@cbsit.com.cy
www.cbsit.com.cy

- a) In writing, with your name, via email addressed to the Officer for Receiving and Monitoring Reports (Y.P.P.A.) at the company's address, cbs-reports@cbs.gr.
- b) Orally, either by telephone at 210 649 2800 or by scheduling a personal appointment with the Y.P.P.A. after submitting a related request at cbs-reports@cbs.gr.
- c) In writing, anonymously or with your name, by sending a postal letter either in person or by mail to the company's address, 44 Bakogianni Pavlou St., Metamorfoosi 144 52, addressed to the Officer for Receiving and Monitoring Reports (Y.P.P.A.).

The Y.P.P.A. will inform and forward the report to the Company's Compliance Officer.

The company is committed to ensuring that all reports received through the aforementioned methods will be evaluated for the accuracy and significance of the information they contain, in order to determine if significant reasons necessitate further action (e.g., conducting an investigation). A fundamental and unchangeable principle of the company is the protection of the anonymity of individuals submitting such reports and the confidentiality of the information they contain.

Our associates and third parties can honestly report, without adverse consequences, incidents of bribery and corruption related to Cosmos's activities to its management. The company's goal is to promote transparency, and for this reason, management will investigate all reports. Reports must be made sincerely and in good faith within the framework of this policy regarding suspicious incidents, even if those suspicions ultimately prove to be incorrect.

The Company reserves the right to take legal action, claiming any actual and consequential damages and moral harm that may have been caused to it as a result of fraudulent, false, and deceptive reports of "incidents" of bribery and corruption.

Athens, 10/10/2024

DIMITRIOS DAFNIS

PRESIDENT & CEO OF COSMOS BUSINESS SYSTEMS A.E.B.E.

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