



# Policy against Corruption, Fraud & Bribery

e-leaflet



# Message from the CEO of Quest Group



Dear colleagues,

A key priority of Quest Group and a continuous pursuit since its establishment is to operate based on integrity, transparency, and compliance, fully aligned with its principles and values. The principle of integrity is an integral part of Quest Group's Code of Conduct & Ethical Behavior, adherence to which is a necessary condition and responsibility of each of us for the healthy development of the Group.

Considering that the issue of fraud, corruption, and bribery is one of the global challenges, both in the public and private sectors, taking the most effective measures possible to combat them by businesses becomes not just necessary but imperative.

As the existence of corruption and bribery means, among other things, increased costs, erosion of competition, and increased risk of damaging the company's reputation, Quest Group, demonstrating its commitment to zero tolerance for corruption and bribery phenomena, has adopted an Anti-Corruption, Fraud & Bribery Policy with clear instructions and directions.

In this context, it is particularly important for all of us to know and apply the directions contained in the Policy against Corruption, Fraud & Bribery, and therefore I urge you to study and ensure that you have understood them. In this way, it will be certain that we know how to behave and react to such incidents. This is a continuous pursuit, not only for the Group's human resources but also for other stakeholders, i.e., external partners, suppliers, customers, etc. The competent and specialized staff of the Group can provide us with support, guidance, and clarifications whenever needed, aiming at the full clarification of our operating framework.

Apostolos Georgantzis  
CEO of Quest Group

# Introduction

The continued success of Quest Group largely depends on the reliability and trust of all stakeholders, particularly customers, suppliers, and investors. The Group's Code of Conduct and Ethical Behavior and the Policy against Corruption, Fraud & Bribery condemn any incidents of fraud, bribery, and corruption and explain the reasons and necessary balances. All business activities and relationships of the Group are governed by the utmost ethical integrity and sincere relationships.

## Purpose

The Policy against Corruption, Fraud & Bribery reinforces Quest Holdings' management commitment to zero tolerance for fraud, bribery, and corruption in general, creating a clear framework of obligations and guidelines.

It serves as a detailed tool for the prevention, deterrence, and combating of these phenomena.

Specifically, the Policy aims to:

- › Ensure compliance with the current legislative and regulatory framework,
- › Understand the definition of fraud, bribery, its forms, and corruption in general,
- › Raise awareness among employees and partners to recognize actions related to fraud, bribery, and corruption in general,
- › Avoid potential adverse civil and criminal consequences,
- › Encourage confidential reporting of any incident or suspicion of fraud, bribery, and corruption in general through specific communication channels,
- › Protect the reputation of the Company, the Group's Companies, and employees.



# Who it Concerns



The Policy clarifies the commitments of:

- ✓ The members of the Board of Directors and individuals holding managerial positions in the Company and the Group's Companies,
- ✓ The Group's personnel,
- ✓ Customers, suppliers, and other partners providing services to the Company and the Group's Companies.

## Definitions and Guidelines According to the Code

### Corruption

Corruption is the abuse of entrusted power for personal gain. A corrupt practice involves the offering, provision, acceptance or pursuit, directly or indirectly, of anything of value to improperly influence the actions of another person.

---

- A corrupt individual can be a private or public employee entrusted with power. Typically, the abuse involves the illegal, usually secret, acquisition of private property or the gain of some other private benefit.

Indicatively, some forms of corruption are:

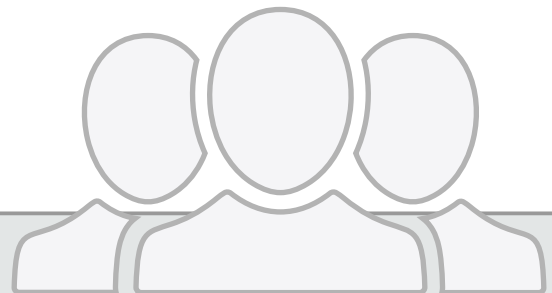
› Bribery

› Nepotism

› Extortion/Blackmail

› Embezzlement of funds

› Acceptance of bribes



## Fraud

Fraud is any act or omission, including false statements, which intentionally or negligently misleads or attempts to mislead someone in order to gain financial or other benefits or to circumvent an obligation.

Fraud can be committed by one or more individuals and may involve employees and/or third parties (customers, suppliers, subcontractors, etc.).

---

Fraud is distinguished into:

› Internal Fraud:

When fraud is committed or attempted by an employee/executive within the organization.

› External Fraud:

When fraud is committed or attempted by individuals outside the organization (customers, suppliers, subcontractors, etc.).

## Bribery

Bribery is a form of corruption and involves the offering, giving, or accepting of something of value with the aim of influencing a person to act or rewarding a person for having acted in violation of their lawful duties.

---



## Methods of Bribery

- › **Active Bribery:** When a person offers, promises, or commits bribery, directly or through a third party, providing any kind of undue benefits for an action or omission related to their duties or contrary to them.

- 
- › **Passive Bribery:** When a person, in violation of their duties, requests or receives, directly or through a third party, for themselves or for a third party, any kind of undue benefits for an action or omission related to their duties or contrary to them.



## Bribery in Practice

- **Facilitation Payments ("greasing the wheels"):** Encouraging a person to perform a duty they are obligated to perform, especially in cases where the monetary amount of the payment exceeds what is actually owed.  
Example: A company paying an employee responsible for permits (e.g., environmental, installation, operation) to avoid delays.
- **Kickbacks:** Bribery paid to a person with the ability to influence an organization in exchange for securing some kind of benefit for the briber. Typically, kickbacks are paid by companies looking to secure profitable contracts or contracts with favorable terms, and in return, part of the benefit from the contract is paid (or "kicked back") to the decision-maker within the awarding organization. The awarding organization is unaware of the payment to its official.

- **Intermediaries – Hidden/Secret Commissions:** Some undertakings often use intermediaries to secure contracts on their behalf, for example, undertaking public works in a foreign country. Hidden commissions are a form of bribery where the intermediary requests or accepts a payment to influence these contracts in favor of the briber, without the company's knowledge or consent. This payment may be for securing the contract, ensuring favorable terms, or even preventing a competitor from securing a similar contract.
- **Exploitation of Influence:** Also known as "trading in influence," undue influence occurs when an employee/official seeks to receive payment (money) in exchange for exercising their influence to secure an unjustified advantage or favor for the payer. The term is also used in cases where the payer asks an employee/official to use their influence to secure an undue advantage or favor in exchange for payment.

Undue influence is more common in the political world but also occurs in business.


## Examples of Payments and Means Used in Bribery

- › Cash or equivalents,
- › Gifts,
- › Donations,
- › Loans, illegal commissions/kickbacks,
- › Promises of additional business activities,
- › Job offers,
- › Entertainment,
- › Expensive trips, accommodation, and participation in events without professional content,
- › Personal or family expenses covered by someone else (prepaid cards),
- › Demand from a public official to be paid in order to perform an act,
- › Acceptance of bribes or other forms of facilitation in exchange for the illegal use of confidential information, conducting rigged competitions, and conflicts of interest,
- › Bribery in exchange for awarding a contract/project.




## Explicit Prohibitions According to the Group's Code of Conduct and Ethical Behavior & the Policy against Corruption, Fraud and Bribery


It is explicitly prohibited for any employee to:

-  Offer, accept, or promise anything of value from any person or entity, private and/or public sector, with the aim of securing business or personal advantage or favorable treatment in the markets, sales, and promotion of the Company's or the Group's Companies' affairs.

---

-  Offer gifts, provide donations, or any other financial support to political parties or their representatives, offer contributions or other types of facilitation to candidates for public office, political parties, or other political organizations.

---

-  Make any form of facilitation payment, even if it may lead to commercial delays, such as paying a small amount to expedite the processing of the Company's or the Group's Companies' application to a Public Authority.





## Examples of Cases Requiring Attention and Increased Caution

To prevent and combat bribery and corruption in general, the following areas are recognized as significant/potential risk areas, for which special rules will apply to mitigate potential risks and adverse impacts on the Company and the Group's Companies, their employees, and society.

### Gifts - Travel - Hospitality - Entertainment

We do not accept or offer money or anything of value as gifts with the aim of gaining personal benefits from those transacting with the Company.

- › We do not offer gifts or benefits to third parties that exceed the limits of usual professional practice and courtesy (up to approximately €150).
- › We do not offer gifts or benefits of any value to public officials or officers when there are situations that may be perceived as an attempt to influence them for the benefit of the Company or the Group's Companies.
- › We do not accept promotional gifts or other benefits (invitations to social events or any form of entertainment, excursions, sports or cultural events, trips, etc.) from third parties if they aim to or give the impression of aiming to influence our judgment or decision, or if they are given in exchange for an action or omission on our part. Each employee may personally accept small-value promotional gifts bearing the company's logo, as well as symbolic gifts during festive periods (considered professional practice) and gifts offered within the limits of usual professional practice and courtesy, provided their value is not significant (up to approximately €150).



*“It is explicitly prohibited to offer or accept gifts in the form of money, regardless of the amount.”*

Specifically, it is not allowed to offer or accept:

- › Equivalent monetary gifts (e.g., prepaid cards, traveler's checks, etc.),
- › Any gift during the period of submitting bids or negotiating contracts with Public Entities or other companies,
- › Travel (e.g., airline tickets, cruises) or accommodation (e.g., hotel stays),
- › Entertainment that may be considered luxurious or significant in terms of cost (e.g., tickets to exclusive sports events),
- › Jewelry, works of art, and related high-value items,
- › Personal gifts (e.g., clothing, electronics, home furniture).

Indicative gifts within the limits of usual professional practice and courtesy include:

- › Meals at reasonable prices, provided the frequency of meals with the same person is not repetitive,
- › Entertainment consistent with the conduct of professional relationships,
- › Items bearing the company's logo, such as calendars, office supplies, keychains, T-shirts, mugs, USB sticks, etc.,
- › Small items or goods representative of the partner's country (e.g., local foods, drinks, small folkloric items, etc.).





## How to Act When We Want to Give or Accept a Gift



We inform our Manager/Supervisor in writing about any offer, acceptance, or request for a gift or other benefits from third parties when we estimate that its value exceeds usual professional practice.

If the Manager/Supervisor determines that the gift exceeds usual professional practice and courtesy, they inform the Compliance Officer and the Company's or the Group's Companies' Management in writing, so they can address the issue and decide whether to accept it or not, or consider converting the gift into a credit invoice.



If a Group company does not have a Compliance Officer, the above written notification is made to the Compliance Officer of the parent company.

## Donations - Sponsorships

We provide donations and sponsorships to organizations, associations, foundations, or administrative services within the framework of Corporate Social Responsibility to support education, sports, culture, social welfare, science, or other related actions with a charitable purpose.



- › Our donations should not give the impression that they aim to secure commercial advantages

It should always be ensured that charitable and social contributions and sponsorships are offered only to recognized organizations and after relevant research and evaluation, without any expectation of gaining business advantage or preferential treatment in return.

## Relationships with third parties (business partners, etc.)

Third parties may represent a potential risk of bribery and corruption in general for the Company and the Group's Companies, as they may not operate according to the Group's standards and may expose the Company and the Group's Companies to legal risks and reputational damage. For this reason, a comprehensive and consistent approach must be followed for managing third parties in all the Company's and the Group's Companies' operations, before and during the collaboration with them, to avoid or mitigate the aforementioned risks.



## How to Report an incident about a violation of the Policy

- The procedure to be followed is outlined in the Group's and the Group's Companies Whistleblowing Policy – Incident Reporting.
  - Reports are made under the condition of sincere and reasonable belief that there has been or is likely to be an incident of non-compliance with the Policy and must be made "in good faith."
- 

## Obligations

- In conclusion, the Group's employees must:
    - › Be aware of the Policy and its content, and
    - › Be vigilant and report appropriately any incident that comes to their attention and involves elements or raises suspicion of corruption/fraud/bribery or a situation that could expose the Group to the aforementioned risks.
- 





## Questions, Objections, Concerns

For any doubt about how to react to a situation or whether a certain behavior may be inappropriate or contrary to the Policy, you should always seek guidance appropriately before acting. The person responsible for providing clarifications or advice is the Company's Compliance Officer.



If a subsidiary of the Group does not have a Compliance Officer, the Compliance Officer of the parent company is responsible.