Anti-Bribery and Anti-Corruption Policy

December 2025

1. Purpose

Goldair Cargo S.A. is committed to conducting all its business in an honest, ethical and lawful manner, and maintains a zero-tolerance policy against bribery and corruption in any form. This Anti-Bribery and Anti-Corruption Policy sets out the Company's responsibilities, and those of its employees and business partners, in observing and upholding this position.

This Policy is aligned with Greek anti-corruption legislation, the OECD Convention on Combating Bribery of Foreign Public Officials, the UN Convention against Corruption, and the principles of the UK Bribery Act 2010 as internationally recognized best practice.

2. Scope

This Policy applies to all employees, officers, directors, contractors, agents and third parties who perform services for, or on behalf of, Goldair Cargo S.A. It covers all business dealings and transactions in all countries in which the Company operates.

3. Definitions

For the purposes of this Policy:

- "Bribery" means the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.
- "Corruption" means the abuse of entrusted power for private gain.
- "Facilitation payment" means a small, unofficial payment made to secure or expedite a routine action to which the payer is legally entitled.
- "Public official" means any officer or employee of a government or any department, agency or instrumentality thereof, or of a public international organization.
- "Third party" means any individual or organization the Company comes into contact with during the course of business, including customers, suppliers, distributors, agents, advisors, and government or public bodies.

4. Prohibitions

The Company strictly prohibits:

a. Offering, promising, giving, requesting or accepting any bribe, kickback, facilitation payment or other undue advantage, whether directly or indirectly, in cash, in kind or through any other means.

b. Any form of financial or non-financial advantage intended to influence or reward improper conduct.

c. The use of intermediaries, agents or third parties to circumvent the requirements of this Policy.

d. Retaliation against any employee or business partner who refuses to engage in bribery or corruption or who reports suspected misconduct.

5. Interactions with Public Officials

Interactions with public officials require particular care. In addition to the general prohibitions above:

- No gifts, hospitality or other benefit of any monetary value may be provided to public officials with the intention of influencing an official act or securing a business advantage.
- Facilitation payments to public officials are strictly prohibited, regardless of local practice.
- Any request from a public official for payments, gifts or hospitality that appears inconsistent with this Policy shall be reported immediately to the Compliance Officer.

6. Gifts and Hospitality

The offering or acceptance of business gifts and hospitality is governed by the separate Conflict of Interest, Gifts and Hospitality Procedure. In summary:

- Gifts and hospitality of nominal value (up to €50) may be given or accepted without prior approval, provided they are reasonable, occasional and cannot be reasonably perceived as influencing business decisions.
- Gifts and hospitality of a value between €50 and €150 require prior written approval by the recipient's direct manager and must be recorded in the Gifts and Hospitality Register.
- Gifts and hospitality of a value above €150 require prior written approval by the Compliance Officer.
- Cash or cash-equivalent gifts (e.g. vouchers, gift cards) are prohibited under all circumstances.

7. Charitable Donations and Sponsorships

Charitable donations and sponsorships must be made only to legitimate, reputable and legally registered organizations. All donations require prior written approval by Senior Management and must be documented and transparent. No donation shall be made with the intention of obtaining an improper business advantage.

8. Political Contributions

Goldair Cargo S.A. does not make political contributions or donations to political parties, political candidates or political campaigns, either directly or indirectly.

9. Third-Party Due Diligence

The Company applies risk-based due diligence to third parties, including agents, consultants, suppliers and joint venture partners, before entering into or renewing business relationships. Key elements include:

a. Screening third parties against international sanctions and adverse media sources.

b. Assessment of the third party's reputation, ownership structure and anti-corruption practices.

c. Inclusion of anti-bribery clauses and audit rights in commercial contracts.

d. Ongoing monitoring of third-party performance and compliance.

10. Books, Records and Internal Controls

All financial transactions must be accurately recorded, transparently documented and supported by appropriate evidence. No off-the-books accounts, false or misleading entries, or undisclosed liabilities are permitted. The Company maintains robust internal controls, including segregation of duties, authorization matrices and independent internal audits, to detect and prevent bribery and corruption.

11. Training and Awareness

All employees receive anti-bribery and anti-corruption training upon hiring and at regular intervals thereafter. Targeted training is provided to employees in higher-risk roles, including procurement, finance, sales and interactions with public officials. Suppliers and business partners are informed of the Company's standards through the Suppliers Code of Conduct.

12. Reporting and Whistleblowing

Any actual or suspected violation of this Policy must be reported through the Whistleblower Procedure. Reports may be submitted confidentially to the Receiving and Monitoring Officer (RMO), in accordance with Greek Law 4990/2022. The Company strictly prohibits retaliation against any person who reports concerns in good faith.

13. Monitoring and Key Performance Indicators

The effectiveness of this Policy is monitored through the following KPIs (target value: zero incidents):

- Number of confirmed corruption or bribery incidents.
- Number of substantiated whistleblower reports related to corruption.
- Percentage of employees who have completed anti-corruption training.
- Number of third-party due diligence checks completed on high-risk suppliers.
- Number of gifts and hospitality entries recorded in the register.

14. Consequences of Non-Compliance

Any violation of this Policy will result in disciplinary action, up to and including termination of employment, termination of commercial contracts, and, where applicable, notification to law enforcement authorities. Employees and business partners must be aware that violations may also result in personal criminal and civil liability under applicable law.

15. Review

This Policy is reviewed at least annually, or sooner where significant operational, organizational, legal or regulatory changes occur.

16. Approval

This Anti-Bribery and Anti-Corruption Policy is approved by Senior Management and communicated to all employees, suppliers, contractors and other relevant stakeholders.

Approved by:

Kallinikos Kallinikos

Vice President & Managing Director, Goldair Cargo S.A.

Date: December 2025