

Anti-Bribery and Anti-Corruption Policy Statement

Purpose and Scope of the Anti-Bribery and Anti-Corruption Policy

The **Eurobank S.A. Group** (hereinafter the “Group”) conducts its activities in an honest, lawful, ethical, and transparent manner and adopts a policy of **zero tolerance** toward bribery and corruption. The Group is committed to acting professionally, fairly, and with integrity in all its business transactions and relationships, wherever it operates, and to implementing and enforcing effective systems to combat bribery and corruption and enhance transparency. The Group follows best business practices, having adopted and embedded into its culture the **Ten Principles of the United Nations Global Compact**. In particular, the **10th Principle, Anti-Corruption**, states that “businesses should work against corruption in all its forms, including extortion and bribery.” Accordingly, the Group complies with all laws related to combating bribery and corruption in the jurisdictions where it operates.

This **Anti-Bribery and Anti-Corruption Policy** (hereinafter the “Policy”) applies to all natural persons, entities, and **third parties** working for or on behalf of the Group, at all levels and positions, under any form of employment (fixed-term or indefinite contracts, full-time or part-time), in any department or facility of the Group and regardless of where services are provided. In cases of non-compliance, the Group may suspend, terminate, or refuse a transaction, relationship, or cooperation. Furthermore, the Policy applies to all Group subsidiaries worldwide, their subsidiaries, joint ventures, and third parties who have access to the Group’s records or premises and cooperate with the Group on a contractual basis, adjusted as necessary to align with local legal and regulatory frameworks. Senior management of the Group leads by example (“Tone from the Top”), committing to the highest ethical standards, demonstrating zero tolerance for bribery and corruption, and promoting integrity in the working and business environment. Failure to comply with this Policy may result in **legal and/or disciplinary actions** against individuals and/or the Group, suspension, termination, or refusal of a transaction.

Definitions of Bribery and Corruption

Bribery

Bribery is any **direct or indirect** offer, promise, giving, acceptance, or solicitation of money, gifts, or any other benefit of any kind—whether for oneself or for another person—as an incentive, encouragement, pressure, or influence to perform an unethical act or breach of trust during the conduct of the Group’s activities. Bribery is illegal, and the Group must have adequate procedures in place to prevent such actions, failing which may also be subject to legal action.

Bribery may take many forms but typically involves a **corrupt intent** by one or both parties (“quid pro quo”), meaning an intention to obtain an improper benefit. Examples include:

- Direct or indirect promise, offer, or authorization of money or anything of value; and/or
- Offering or receiving any incentive, disincentive, loan, fee, reward, or other benefit; and/or
- Providing assistance, donations, or votes intended to exert improper influence.

Examples of bribery include:

- A customer offering payment or a gift to a staff member so that a new account may be opened, even though the application would normally be rejected.
- A potential supplier offering money or gifts to influence a tender process.
- A job applicant offering payment to increase their chances of being hired.

Corruption

Corruption is a form of dishonest act or criminal offense committed by a person or entity entrusted with power and responsibility, for the purpose of obtaining unlawful benefits or abusing authority for personal gain.

Corruption also includes the direct or indirect inducement of a third party to engage in corruption, facilitating or participating in corruption by a third party, or concealing acts of corruption.

Forms of corruption include, but are not limited to:

- Abuse of power to coerce another person into illegal or unethical acts.
- Falsification of corporate records.
- Agreements that distort competition.

- Intentional manipulation of financial statements, such as artificial inflation of assets, understatement of liabilities, recording fictitious transactions, or failure to record transactions and obligations.

Examples of corruption include:

- Manipulation cases related to interbank offered rates.
- Managers approving invoices for products or services received personally.
- Misappropriation of corporate assets.

Basic Principles for Combating Bribery and Corruption

The Group adopts international practices for managing and addressing bribery and corruption risks, based on the following principles:

- Zero tolerance toward bribery and corruption.
- Implementation of effective control procedures for prevention and detection.
- Maintenance of an effective compliance program.
- Provision of confidential reporting mechanisms for employees and third parties, with protection for good-faith whistleblowers.
- Monitoring of bribery incidents.
- Regular risk assessment and analysis across all Group structures and operations, which it monitors, reviews, adjusts, and revises.
- Maintenance of a bribery incidents registry or corruption attempt, in order to be taken into account in decision-making
- Use of questionnaires to assess minimum anti-bribery requirements for third parties.
- Continuous improvement of anti-bribery management systems.
- Ongoing training and awareness for staff.
- Immediate, firm, and explicit rejection of any bribery or corruption attempt.

Areas of specific interest

Gifts and Hospitality

Gifts range from small items (e.g., calendars, flowers, food) to hospitality expenses (meals, events, tickets, vacations). Reasonable and proportionate hospitality is unlikely to be considered bribery unless excessive or frequent. The key criterion is whether there is **intent to exert improper influence**.

The Group has set specific criteria for accepting gifts and hospitality.

Sponsorships and Charitable Donations

The Group supports charitable, social, cultural, and educational initiatives, applying due diligence and documentation. The decisive factor remains the absence of improper influence.

Political Donations

Sponsorships or donations to political parties or political organizations are not permitted.

Facilitation and Kickback Payments

Small payments intended to expedite routine actions (“facilitation”, “grease” payments) are illegal and strictly prohibited. The Group adopts zero tolerance. Kickback payments in exchange for business favors are also prohibited.

Public Officials

Bribery of Greek or foreign public officials is prohibited and applies to staff and, where known, customers engaging in such actions.

Employee training

The Group regularly trains and informs staff about emerging bribery and corruption risks. New staff receive targeted training, and all staff acknowledge the updated Policy annually.

Reporting and Transparency

The Policy, which is aligned with broader compliance, ethics, and sustainability frameworks, is reviewed annually by Group Compliance, unless legislative changes require earlier revision. Management, the Audit Committee, and the Board of Directors are informed annually of program effectiveness. The Annual Financial Report includes references to anti-bribery and anti-corruption actions.

Reporting Bribery and Corruption

Employees and third parties are encouraged (both through this Policy and as defined in the Policy for Reporting Illegal or Unethical Conduct or Violations of European Law) to report incidents through confidential or anonymous channels, with protection against retaliation, via:

- **Email:** ethicshotline@eurobank.gr
- **Mail:** Pasmazoglou 2–6, 105 59 Athens, to the attention of the RRMO

- **Hotline:** +30 214 405 8990 (ext. 58990), 24/7 voicemail all year round (to the attention of the RRMO)
- **Internal units:** Group Compliance, Internal Audit, etc inform and forward the report to the RRMO.

Disciplinary Process and Escalation

The Group applies fair and timely disciplinary procedures regardless of hierarchy. Proven bribery or corruption may result in immediate termination of cooperation, disciplinary action, dismissal, and referral to competent judicial, police, or supervisory authorities. Third parties are required to provide written commitment to preventing and combating against bribery and corruption (Code of Conduct for Suppliers, Statement of acceptance of the Policy against Bribery and Corruption). Any confirmed violations result in termination of cooperation.