INTERBANKING SYSTEMS S.A.

Anti-Fraud & Corruption Policy

Document Information

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History of Changes

PUBLICATION	DATE	SUMMARY OF CHANGES
1.0	28-09-2023	Original version
1.1	29/10/2025	Amendment following the subordination of the Compliance Function to the Legal and Compliance Department

Related Documents

1. Code of Ethics & Conduct
2. Policy for the Protection of Personal Data

3. Policy on Acceptance and Offering of Benefits
4. Whistleblowing Policy

Contents

1. Purpose

This Policy aims to prevent and deter any form of fraud and corruption that may take place within the Company's turnover and in general within the framework of its activity. The Company is aware and hereby informs its employees that any act of corruption or fraud is condemned, prohibited and sanctioned, both internally and under the applicable legal framework.

2. Scope of Application

This Policy is addressed to, concerns and binds the members of the Board of Directors and the staff of the Company, as well as third parties who cooperate with the Company and act on its behalf and concerns delinquent acts both in the place and in the hours of work provision and outside but related to any form of activity of the Company (hereinafter: "the Employees" of DIAS).

3. General Principles

- DIAS implements a **zero-tolerance** policy against corruption and fraud and is committed to operate with professionalism, legality and integrity in all its professional transactions.
- The manner in which all employees perform their duties on a daily basis has a particularly significant impact on the achievement of DIAS' business objectives and strategic vision. Employees are expected to act with the highest standards of integrity and efficiency in the course of all DIAS activities.
- Any instance of prohibited conduct must be reported promptly and investigated thoroughly and fairly.
- The Company is committed to adopt anti-corruption measures to maintain a high level of ethics and protect its reputation.

4. Definitions

Fraud is defined as any act or omission, including falsification of data, in which someone, intentionally or due to gross negligence, misleads or attempts to mislead someone in order to obtain financial or other benefit or to avoid an obligation. Due to the nature of the Company's activities, there is a risk of fraud through unauthorized access to and use of information systems and infrastructure, to which the Company pays particular attention and attention by providing the corresponding safeguards, as detailed below.

The following cases may also be indicative categories of fraud, provided that the conditions of the above definition are met:

- Financial fraud e.g. fraud related to contracts or commissions;
- Illicit trafficking of confidential information;
- False reporting, usually in the form of falsification of financial statements,
- Forgery or falsification of data or documents;
- Participation in illegal acts of third parties;
- Misappropriation / Theft / Embezzlement of assets.

Corruption consists of the abuse of authority or the exploitation of a position for private gain. Abuse of authority is defined as the use of one's position or other privilege entrusted to one individual for a purpose other than that for which it was granted, particularly for the purpose of obtaining an undue or unjustified benefit for oneself or for a third party. The definition of corruption also includes the ***undue exercise of influence,*** i.e. the exploitation of the influence or connections that someone has - or claims to have - in order to obtain property or other benefits. The definition of corruption

also includes bribery/passive bribery as well as the payment of a facility, in relation to which the respective corporate Policy applies.

5. Roles and responsibilities

The Board of Directors of DIAS is responsible for determining the risk appetite regarding fraud & corruption issues, cultivates a culture that promotes/promotes ethical behavior and accountability and ensures that the Company has an adequate and functional internal control and risk management system in place by ensuring that the Company has designed and implemented effective controls to manage fraud & corruption risk.

The Audit Committee assists the Board of Directors in the adoption and implementation of an adequate and effective Internal Control System and consequently in the implementation of an effective System for the management of the risk of Fraud / Corruption.

The Chief Executive Officer together with the Directors are the **first line of defense** against fraud and corruption. In particular, the Chief Executive Officer is responsible for the effective implementation of the internal control system, as well as for the proper functioning and observance of the control mechanisms.

The Directors are responsible for developing procedures and control points to effectively address fraud and corruption risks and to implement corrective actions in cases of identified weaknesses in procedures and control points. They should also be constantly vigilant in the event that unusual events are indications of fraud or attempted fraud. Employees must have, and appear to have, the highest standards of honesty, decency and integrity in the performance of their duties. They are responsible for the immediate identification and reporting of any suspicion of fraud and corruption, through the established communication channels of the Company.

The Compliance Function and the Risk Management Function are the **second line of defense** in fraud & corruption prevention, focusing on specific objectives such as: compliance with laws, regulations and ethical behavior. They provide complementary experience and support in monitoring fraud & corruption risks. However, responsibility for risk management remains part of frontline roles and within the responsibilities of the Administration.

The Internal Audit Functionprovides, as **a third line of defense**, an independent and objective assurance for the adequacy and effectiveness of the control mechanisms in the context of fraud risk management. To this end, the Internal Auditor prepares and executes annual audit plans, specifically taking into account and assessing the risk of fraud.

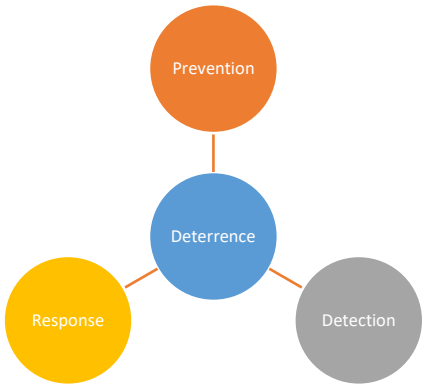
6. Fraud & corruption risk management

The process of identifying and assessing the risk of fraud and corruption is not a one-off but is an ongoing process, which requires the periodic assessment of existing fraud risks.

The process of identifying and managing fraud & corruption risks is part of the Company's annual risk self-assessment, which is carried out by the Risk Management Function and the Compliance Function in collaboration with the Directors, taking into account the operation and effectiveness of the control mechanisms that the Company has put in place in its procedures.

The results of the risk assessment and management process are reflected in the Risk Registry as well as in the Company's Compliance Risk Assessment. They are also communicated to the Chief Executive Officer and the Audit Committee on a regular basis.

7. Framework for actions to prevent corruption and fraud



The purpose of an effective fraud and corruption risk management system is the continuous and systematic effort to reduce the likelihood of adverse events occurring and to mitigate the consequences that they could bring. The main actions to prevent incidents of corruption and fraud fall into three general categories, prevention, detection and response. One of the most effective ways to prevent fraud and corruption is to adopt methods of reducing incentives as well as limiting opportunities.

Prevention

The Company has established proportionate control mechanisms for the prevention of fraud and corruption, as well as the implementation of regular training and awareness actions for employees against corruption and fraud.

In particular, DIAS, in the context of fraud and corruption prevention, to the extent possible, has defined important preventive measures:

- **Administration's Tone at the Top:** In order to address corruption and fraud cases, it is necessary for the leadership to commit to the consolidation of a climate of integrity and to the adoption and implementation of policies to effectively address these cases.
- **Code of Ethics & Conduct:** All DIAS employees must have a high sense of responsibility in the performance of their duties, acting with the sole interest of the Company in mind. They must apply high standards of ethics, act with personal and professional integrity as well as maintain and protect the confidentiality of the information they receive in the performance of their duties.
- **Recording of control mechanisms** through the Company's Policies and Procedures and continuous strengthening of the corporate governance system, such as evaluation of partners, suppliers and other counterparties and limited access to information systems.
- **Recruitment of employees** following strict selection and control through an objective system of criteria.
- **Implementation of training programs for the prevention and detection of fraud and corruption:** The Company ensures the appropriate and continuous training of its employees on issues related to corruption and fraud. For this purpose, it organizes regular seminars, the attendance of which is mandatory for every employee. The content of the seminars is in accordance with the applicable legal provisions on corruption and bribery.
- **Segregation of tasks** in high-risk areas such as procurement management, banking agreements, and electronic payment management.
- **Passwords and complexity rules. firewall.**

- **Transparency of Transactions:** The Company ensures that all its transactions with third parties are distinguished by transparency and are processed in accordance with predetermined procedures. For this purpose, detailed and organized records are kept, which clearly and explicitly include all the details of the transactions carried out by the Company. These records are made available for inspection to the Compliance Officer, the Board of Directors and any person expressly and specifically authorized by it.

Detection

The Company is aware of the areas of high risk of fraud and corruption. It has established analytical procedures which are constantly being improved for the early identification of any existing weaknesses in the internal control system. Part of the fraud detection process is the regular conduct of internal audits, the monitoring of the implementation of internal audit proposals, the identification and reporting of unusual and suspicious behavior, strict control mechanisms as well as the continuous risk assessment. Finally, the Company has established clear communication mechanisms that ensure the reporting of potential cases of fraud as well as weaknesses in the existing control environment.

Response

The Company's response to incidents of fraud or corruption is immediate. The procedure to be followed in case of dealing with fraud incidents is described below in **Section 8**.

8 Fraud detection, screening and sanctions enforcement

Allegations of fraud or corruption usually arise either from a report/complaint or through scheduled internal audits. Any potential violation must be immediately notified by name or anonymously to the Whistleblowing Officer, through the communication channels mentioned in the Whistleblowing Policy.

9 Disciplinary penalties / Sanctions

The imposition of disciplinary penalties does not exhaust the other rights of the Company, which derive from the applicable legislation. The decision on sanctions will be taken by a person or body of the Company that has sufficient independence and authority to execute its decision, with the relevant provisions of the Whistleblowing Policy (section 9) and the Employment Regulation (article 16) being applied accordingly.

For the imposition of sanctions, the following are taken into account:

1. The seriousness and duration of the act
2. the degree of responsibility of the person responsible for the violation
3. the existence of intent or negligence of the person responsible for the breach
4. the possible incitement of the person responsible for the breach by another person in order to commit the breach
5. any previous violations of the person responsible for the violation (recurrence)
6. the measures taken by the person responsible for the infringement to prevent any repetition of the act, and
7. any other incident related to the specific case.

10 Updating and adhering to the Policy

The Policy is reviewed every three years or whenever necessary, by the Legal and Compliance Department and approved by the Board of Directors. In case of modification of the Policy, the Company ensures that the employees are immediately

informed in any appropriate way.

In particular, the Legal and Compliance Department proposes updates and improvements:

- following changes in the legislative and regulatory framework related to fraud and corruption
- following recommendations by the internal audit
- upon detection of gaps or violations

The Internal Audit Function and the Regulatory Compliance Function monitor compliance with this policy.

Disclaimer: This is an English translation of the official company text originally drafted in Greek, provided for informational purposes only. In the event of any discrepancy between the Greek and the English versions, the Greek version shall prevail.