

The company **UNIVERSAL EDUCATION S.A.** is a leading independent company providing professional training and consulting and career guidance services. The high-quality professional training programs it provides are aimed at fully meeting the requirements and expectations of the trainees and harmonizing them with the modern needs of the labor market, in accordance with the applicable legislative and regulatory provisions. of the human resources of

**UNIVERSAL EDUCATION S.A.** and its partners, suppliers and customers against the phenomenon of bribery and seeks to strengthen the commitment of its Managers, Shareholders, persons exercising managerial duties, as well as persons where act on behalf of the company for zero tolerance for bribery. In particular, the Anti-Bribery Policy of **UNIVERSAL EDUCATION S.A**.:aims to comply with the applicable legal and regulatory framework to combat bribery is suitable for quality service delivery & protects the company's reputation provides a framework of obligations and guidelines used as a tool to prevent, deter and combat bribery

✓ provides the framework for defining, reviewing and achieving anti-bribery targets

- ✓ encourages immediate and confidential reporting/reporting of any incident or suspicion of bribery and the vigilance of employees and associates for the recognition of actions related to bribery based on trust, without fear of reprisal, enabling them to direct any report/complaint to, whether of an incident of bribery
- or any illegal and controversial activity, to—XI:

(a) With an electronic shipment/complaint via email to compliace@ueducation.gr at Mavrokordatou 1-3, T. K. 10678, Athens, to the attention of the Bribery Incident Management Committee and marked "Confidential"

meets the requirements of the Anti-Bribery Management System according to the ISO 37001:2017 standard and aims for its continuous improvement <u>encourages the</u> company's employees and partners to report related and non-relationships with Public Officials or Business Suppliers/Partnersimplements the principle of independence of the anti-bribery compliance function explains the consequences of non-compliance with the anti-bribery policy commits to the compliance audit of UNIVERSAL EDUCATION S.A. with the legislation that governs the activity of,

conducts financial and non-financial controls in its internal operation

The Policy is binding on all, without exception, employees, shareholders, members of the Board of Directors, partners, financial and legal advisors, suppliers and any other third party who acts on behalf of the company. **Interested parties may contact the company to report any illegal and dubious business activities, potentially involving** UNIVERSAL EDUCATION A.E.

Andreas Rodopoulos Vice President & CEO the legislation governing its activity carries out financial and non-financial audits on its internal operation The Policy is binding on all, without exception, employees, shareholders, members of the Board of Directors, partners, financial and legal advisors, suppliers and any other third party acting on behalf of the company.



Interested parties may contact the company to declare any illegal and dubious business activities potentially involving UNIVERSAL EDUCATION S.A.

Andreas Rodopoulos Vice President & CEO