AEGEAN AIRLINES S.A.

ANTI-BRIBERY, ANTI-CORRUPTION POLICY
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Introduction

The Company "Aegean Aviation SA" (hereinafter the "Company") establishes, maintains and applies basic principles and rules regarding Bribery and Corruption.

The Anti-Bribery and Anti-Corruption Policy is valid for four (4) years (hereinafter referred to as the "Duration of Validity") from the date of its approval, unless revised and / or amended earlier.

Statement

The Anti-Bribery and Corruption Policy applies to the Company and its subsidiaries.

Management is committed to achieving the highest standards of ethical conduct and professional integrity and ensures that all its employees, as well as third parties providing its products and services, comply with its policy.

Definitions

➢ Bribery: The practice of offering (usually money), to gain an unjustified or illegal advantage. Apart from cash, bribery may take the form of a high-value gift in kind or service, hospitality, entertainment, travel, employment, internship, loans, shares, which is clearly intended to influence the way one performs or fails to perform his / her employment, public, commercial and legal duties.

➢ Corruption: Abuse (or incitement to abuse) of a position of trust or power (personal, political or commercial) for the purpose of gaining unjustified personal, political or commercial advantage.

Risks and consequences of non-compliance

Violation of anti-corruption legislation can lead to serious civil and criminal penalties as well as negative consequences for corporate reputation.

Similarly, employees who break the law may face severe civil and criminal penalties under the current legislation. Violation of the policy will lead to disciplinary action, including the termination of the employment contract.

General principles

Bribery and corruption

No form of bribery or corruption is tolerated.

We do not provide bribes, we do not offer and we do not promise any provision of direct or indirect benefit to any person in order for the Company to perform an act or omission that will lead to the acquisition or maintenance of a business advantage.
We do not offer any direct or indirect benefit to third parties when there is a reasonable suspicion that bribes will be offered.

We do not provide facilitation payments to government officials to expedite or facilitate non-discriminatory actions or services, such as obtaining a regular license or business license.

We do not accept bribes. We do not demand or accept, directly or indirectly, for ourselves or for third parties, benefits of any kind, in order to cause or reward improper execution in the form of an act or omission that conflicts with the functions of the Company and our employees.

**Money laundering**

We actively comply with anti-money laundering laws and regulations and terrorism and work with authorities where necessary to facilitate their investigations.

**Gifts**

We do not accept high value gifts other than the usual ones (e.g. diary, gift with corporate logo, pens, flowers, sweets) as well as gifts that could be considered excessive and inappropriate.

Gifts in cash or other equivalent (e.g. gift cards) are not accepted, except for the Company Miles and Bonus cards, its subsidiaries or affiliates.

We do not allow gifts to be given to anyone (government officials or business associates) in exchange for any undue favor or benefit.

**Donations**

We do not provide donations in order to wrongly influence a government official in return for any improper favor or benefit. However, upon evaluation and approval, direct donation to a government agency (and not to an individual government official) is permitted as part of a charitable effort, for a social purpose or a coordinated effort by various agencies, or if formally requested by that government agency.

**Recruitment of government officials**

It is not allowed to hire a government official or his direct family member, as well as political contributions, in order to mistakenly influence the officer, or in return for any inappropriate favor or benefit.

**Audit**

Periodic internal audits will be conducted to ensure that the Company, its employees and third parties comply with applicable anti-corruption legislation and this Policy.

**Reporting of incidents**

You can report cases of non-compliance or of suspicious behavior at the following:
• Via telephone: +30 210 6261640,
• Via SMS: +30 6932278478
• Via e-mail at: compliance@aegeanair.com,
• Via the web page at the link https://app.incy.io/aegean-airlines/links/whistleblowing

**Responsibilities**

**Chief Executive Officer**
The CEO is responsible for ensuring that all cases are handled fairly, thoroughly and in accordance with the policy.

**Directors**
All managers are responsible for ensuring that employees are aware of the policy and its implementation, but also for creating an environment in which employees are able to report any cases freely, without fear of retaliation.

**Staff**
Employees have a responsibility to comply with the policy as well as to report relevant cases.

**Indicative cases that may raise concerns of bribery and corruption**
The following list is not exhaustive and is used for comprehension purposes.

If you come to mind or realize any of the following while working / working for us / with us, you should report them directly using the reporting channels.

➢ You realize that a third party is involved or has been accused of engaging in inappropriate business practices,
➢ You learn that a third party has a reputation for paying bribes, or demanding bribes, or having a reputation for having a "special relationship" with government officials,
➢ A third party insists on receiving a commission or payment of commission before committing to sign a contract with us,
➢ A third party requests payment in cash and / or refuses to sign a formal commission or remuneration agreement or to provide an invoice or receipt for payment,
➢ You learn about private meetings that take place between parties participating in public procurement or with civil servants,
➢ There is an unusually smooth process of issues where a person does not have the expected level of knowledge or expertise,
➢ Documents or files related to meetings or decisions cannot be located,
➢ There are deviations from the usual bidding procedures,
➢ Corporate procedures or instructions are not followed,
➢ There is a refusal to agree on non-corruption provisions in the agreements,
➢ Statements that should be disclosed such as a third party bragging about its relationships or recommending that the Company without asking how it can achieve its purpose,
➢ A third party requests payment in a country or geographical location other than that residing or conducting business,
➢ A third party requests an unexpected surcharge or commission to facilitate a service,
➢ Third party requires rich entertainment or gifts before starting or continuing contract negotiations or services,
➢ A third party requests payment to be made for possible legal or regulatory violations,
➢ A third party asks you to provide employment or some other benefit to a friend or relative,
➢ You receive an invoice from a third party that appears to be non-standard or customized,
➢ The Company has been invoiced for the supply or payment of fees that seem large, given the service that is declared to be provided (unless there is a signed contract),
➢ A third party requests or requires the use of a representative, broker, consultant, or supplier that is not commonly used or is not known to the Company,
➢ You are offered an unusually generous gift by a third party or you are offered rich hospitality by a third party, for the purpose of bribery.