

ANTI-BRIBERY POLICY

The Company "GOLDCHEM LTD" since its foundation in 1994, has been active in the promotion and sales of innovative raw materials of high quality.

After 25 years of presence and collaborations with various industrial sectors it has gained a very reliable name in terms of its services.

Due to our cooperation with major firms abroad, GOLDCHEM is able to offer a wide range of raw materials to various industries operating in the sectors of paints and varnishes, cosmetics, polyurethane foams, plastics industry, etc.

This Policy aims to raise awareness among all employees and associates of GOLDCHEM LTD against the phenomenon of corruption and bribery and seeks to strengthen the commitment of its Partners to zero tolerance of bribery, by creating a framework of commitments and guidelines, to be used as a tool for the prevention and combat bribery and corruption.

In particular, the Anti-Bribery Policy of GOLDCHEM LTD:

- ✓ aims to comply with the applicable anti-bribery legal and regulatory framework
- ✓ seeks to understand the definition of corruption and its forms
- ✓ seeks the vigilance of employees and any person liable to identify actions related to bribery
- ✓ is suitable for the provision of services
- ✓ provides the framework for setting, reviewing and achieving anti-corruption objectives
- ✓ encourages the confidential reporting of any incident or suspicion of bribery through the specific means of communication and the vigilance of employees and associates to identify actions related to bribery based on trust, without fear of retaliation, giving them the opportunity to also contact Transparency International Greece via email compliance@goldchem.gr
- ✓ meets the requirements of the anti-bribery management system in accordance with ISO 37001:2016 and aims at the continuous improvement of the system
- ✓ encourages the company's employees to report any kind of relationships with Public Officials or Suppliers/Associates of the company.
- ✓ applies the principle of independence of the anti-corruption compliance function
- ✓ explains the consequences of non-compliance with the anti-bribery policy
- ✓ is committed to checking GOLDCHEM LTD's compliance with the legislation governing its activity
- ✓ leads to financial and non-financial audits internally in its operations.

The Policy is binding on all Employees, Members of Management, Business Partners, Financial Advisors, Legal Advisors, Suppliers, Subcontractors and any other third party acting on behalf of the company without any exception. In the annual review by the Management, compliance with this Policy is reviewed.

Interested parties and stakeholders may contact the company to report any illegal or dubious business activities which may potentially involve GOLDCHEM LTD through the company's Compliance Officer or by mailing to the company's address, to the attention of the Compliance Officer, at Solomou 7, Chalandri Athens.

THE OWNER

I. KASSINAKIS