



ANTI-BRIBERY AND CORRUPTION POLICY

ALME MARINE SA, recognizing the need to combat corruption and bribery, in order to enhance the Company's credibility and reputation, the transparency and efficiency of its business operations and to respond to the needs and expectations of its stakeholders, has undertaken the development, installation and commitment to the implementation and continuous improvement of an Anti-Bribery Management System, in accordance with the requirements of the International Standard for Anti-Bribery Management EN ISO 37001:2016.

The scope of the System is:

- Supply, Marketing and Distribution of Internal and External Combustion Engines & Components
- Provision of Consultancy Services for the Maintenance of Internal and External Combustion Engines

In this way, it aims to strengthen the Management's Commitment to zero tolerance of bribery and to raise awareness among all employees and associates of the Company against bribery by creating a series of procedures that will ensure the prevention, deterrence and combating of bribery.

ALME MARINE SA is particularly committed to:

- To comply with the current legal and regulatory framework in place to combat bribery
- To comply with the requirements of the Anti-Bribery Management System according to the ISO 37001:2016 standard.
- Encourage the confidential reporting of an incident or suspected or attempted incident of bribery through specific communication channels by the Company's employees and partners without fear of retaliation to the Anti-Bribery Compliance Function Manager (ACFO) and relevant Company personnel.
- Explain the authority and independence of the Compliance Function Manager in the Company's regulatory compliance and anti-bribery compliance audit process.
- Explain the consequences of the Company's failure to comply with this policy
- To support the function and independence of the YLSC in the Company's regulatory compliance and anti-bribery compliance audit process,
- the consequences and penalties for non-compliance with this policy,
- providing the necessary resources and appropriate means to train, raise awareness and involve staff in regulatory and anti-bribery compliance issues, aiming at continuous improvement of the BMS.
- To continuously improve the Anti-Bribery Management System in its business operations through the following tools:

Assessing the risks and implementing the necessary actions.

- Establish and achieve the Company's regulatory and anti-bribery compliance objectives.
 - Implement due diligence and anti-bribery controls.
 - Conduct internal reviews.
 - Staff training and awareness raising.
 - Management of non-compliances and corrective actions.
 - Review of Management and the Compliance Function Manager
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- The relevant requirements of the stakeholders regarding their obligations to comply with both the applicable legal framework and the anti-bribery legislation, as well as their participation in the EMS, have been incorporated into the operation of the company through the EMS documents.
 - In the above context, the Firm's management is committed to supporting the implementation, monitoring and maintenance of the CPD, which will be periodically reviewed, revised and improved as necessary, in order to continuously ensure its regulatory compliance with both the applicable legal framework and the anti-bribery framework.
 - The officers and employees of ALME MARINE SA, as well as third parties working on its behalf, are not allowed to offer, promise or bribe anyone, as well as to solicit a bribe from anyone.
 - This policy is binding on the management, executives, employees and any other person involved in the operation of the company, including any kind of external benefits and professional partners.
 - Failure to comply with this policy, whether unintentionally or intentionally, may result in disciplinary sanctions for those involved as well as criminal prosecution in accordance with applicable anti-corruption laws.
 - This Anti-Bribery Policy is communicated and available to all interested parties and is reviewed periodically by the Company's management.

22nd January 2025

The Chairman of the Board & CEO