

COMBATING BRIBERY

NBG has throughout the years demonstrated its commitment to operating in a manner that strives to ensure adherence to the highest legal and ethical standards. This approach primarily reflects the moral principles that the Group has adopted, as well as the culture and values embedded in its activities globally.

Within this context, and in order to enhance corporate governance procedures, the NBG Group Anti-Bribery Policy was adopted, taking into account the fact that bribery is a widespread phenomenon in international business transactions, which causes serious ethical and political concerns, undermines the efficient governance of companies and the economic development; and distorts international competition.

The Policy further enhances the existing framework consisting of individual rules the Bank has adopted to combat any type of bribery (active or passive), as this is determined through relevant provisions of the Code of Ethics and the Bank's Labor Regulation.

The Policy:

- a. Applies to all board members, senior executives and employees of the Bank and the Group; and generally to any person working for the Group under a contract of employment or otherwise
- b. Binds third parties who perform services for or on behalf of the Group
- c. Establishes specific principles and rules governing the Group's activities for the prevention and combat of bribery
- d. Adopts procedures which discourage bribery and corruption practices, such as procedures on bribery risk assessment, handling of gifts and business hospitality, donations to political parties and charitable institutions, evaluation of third parties etc.
- e. Encourages confidential reporting of suspicions, through the appropriate communication channels, which ensures the protection of individuals and the appropriate investigation of the reported event