

<p>MANUAL HPI MANAGEMENT SYSTEMS MANUAL ANNEX 3</p>		<p>HPI_A3-01_Annex 3</p>
<p>Anti-bribery Anti-fraud Policy</p>		<p>Date of Issue: 23/02/2024 Page: 1 of 5</p>

Vision and Objectives

The Health Policy Institute (HPI) is committed to maintaining a transparent and trustworthy environment, rooted in the highest standards of business ethics. HPI implements an Anti-Bribery Management System certified with the International Standard EN ISO 37001:2016. HPI’s main objectives for preventing bribery include:

- Continuous adherence to all legal and regulatory requirements related to anti-bribery measures (Legal compliance)
- Zero tolerance of bribery for all personnel and collaborators, regardless of status or contract type (Zero-tolerance policy)
- Clear prohibition of bribery and corrupt activities of any kind (Absolute intolerance)
- Establishment of practical anti-bribery goals with clear methods for monitoring and improvement, tailored to the organization’s size (Strategic Framework)
- Fostering an open environment where employees, associates, and contractors feel comfortable to report concerns or suspicions, without fear of retaliation (Safe reporting)
- Confidential, proportionate complaint management and investigation processes (Confidential processes)
- Targeted staff (and contractor) training designed to raise ethical awareness across our project-based operations (Continuous education)
- Routine communication and encouragement of external partners and suppliers to engage with anti-bribery best practices (Partner engagement)
- Sensible, risk-based evaluation of bribery risks as they arise during HPI’s operations or activities (Risk assessment)
- Repeated staff education to maintain a high-level of anti-bribery awareness within our organizational community (Enhanced training)
- Full compliance with Anti-Bribery Management System requirements, with regular reviews to ensure continuous improvement (Full compliance)

Management is responsible for monitoring the effectiveness and relevance of this Policy over time. All employees, collaborators, and contractors are required to fully implement this policy.

<p>MANUAL HPI MANAGEMENT SYSTEMS MANUAL ANNEX 3</p>		<p>HPI_A3-01_Annex 3</p>
<p>Anti-bribery Anti-fraud Policy</p>		<p>Date of Issue: 23/02/2024 Page: 2 of 5</p>

Introduction

Bribery refers to the solicitation, receipt, offer, or granting of money or other undue and unlawful benefits to or by an HPI employee, associate, external collaborator, or Public Official in pursuit of professional or personal advantage. Common examples include:

- (a) monetary gifts – cash or cash equivalents
- (b) personal favors and reciprocal benefits
- (c) commission payments
- (d) business promises
- (e) non-professional paid travel
- (f) personal / family expenses
- (g) unrepaid loans,
- (h) request for payments from public officials for routine acts

Bribery carries both civil and criminal consequences. It is categorized into active bribery (when someone offers unlawful benefits for actions/omissions by HPI members related to their duties) and passive bribery (when HPI members solicit or accept unlawful benefits for actions/omissions related to their duties).

Scope of application

The Anti-Bribery Policy applies to all HPI team members, whether employees, contractors, board members, or consultants, and across all projects. Senior Management ensures top-down commitment and models compliance at every level by demonstrating commitment to the principles of ethics and integrity. All HPI personnel, regardless of their function, position, role, or duties, must understand that HPI’s reputation and long-term business success depend on embedding integrity within every project and client engagement. This Anti-Bribery Policy also governs the establishment of relationships with any Contractor intending to enter into professional relationships with the company, as well as the continuation of business activities with them. Violations

<p>MANUAL HPI MANAGEMENT SYSTEMS MANUAL ANNEX 3</p>		<p>HPI_A3-01_Annex 3</p>
	<p>Anti-bribery Anti-fraud Policy</p>	<p>Date of Issue: 23/02/2024 Page: 3 of 5</p>

of this Policy by HPI employees, associates, or contractors will result in disciplinary action, employment contract termination, as well as possible referral to competent authorities.

Policy Framework

The offering or receipt of any form of improper payments or undue benefits is strictly prohibited at HPI. Bribery is illegal under Greek law and relevant European/international conventions, such as the Organization for Economic Co-operation and Development (OECD) Anti-Bribery Convention. All personnel and collaborators are required to comply with these laws and are subject to all relevant penalties in cases of violation.

Transactions with Government Officials

No HPI member or collaborator may promise, offer, or deliver any benefit (including small gifts or “facilitation payments”) to Government Officials to improperly influence official acts within the scope of their duties. “Government Officials” include public sector staff, representatives of public international organizations, government-controlled entities or government representatives, or candidates for public (political) office.

Transactions with private entities and Individuals

HPI staff, associates, and suppliers must act with integrity in all business transactions, avoiding any attempt to improperly influence private decisions through payments, favors, or undue advantages.

Corporate Hospitality and Gifts

Legitimate hospitality and gifts valued under €200 to or from third parties, exchanged reasonably and justified for project or relationship-building purposes, may be offered or accepted, provided these activities are transparent, proportional, and in line with HPI’s ethical standards.

<p>MANUAL HPI MANAGEMENT SYSTEMS MANUAL ANNEX 3</p>		<p>HPI_A3-01_Annex 3</p>
	<p>Anti-bribery Anti-fraud Policy</p>	<p>Date of Issue: 23/02/2024 Page: 4 of 5</p>

Awareness and Responsibility

All HPI personnel and collaborators share responsibility for compliance with this Policy. HPI Management and project leads ensure that staff and external contributors receive appropriate training and guidance regarding anti-bribery practices. Educational activities are regularly scheduled to reinforce understanding of this Policy content and raise awareness among all employees on bribery matters.

Conflicts of Interest

Conflicts of interest arise when an individual’s interest interferes or appears to interfere with HPI’s interests. All HPI personnel must avoid situations where their judgement may be affected by external offers, contracts, or gifts beyond the accepted limits, since a conflict of interest can develop into a bribery issue. Examples of potential conflict situations include personal interest in a contract, employment outside the company, or use of company’s confidential information in personal transactions

Record keeping

Record-keeping procedures, proportional to HPI’s scale, are maintained as part of the organization’s integrated Quality Assurance System to support compliance and transparency.

Violations and Sanctions

HPI strictly enforces this Policy, treating every substantiated violation as a serious disciplinary matter. While disciplinary penalties are decided separately in each case based on the nature and severity of the violation according to the principle of proportionality, all cases are managed consistently based on the principle of equality. Any disciplinary penalties imposed are subject to the applicable law.

<p>MANUAL HPI MANAGEMENT SYSTEMS MANUAL ANNEX 3</p>		<p>HPI_A3-01_Annex 3</p>
<p>Anti-bribery Anti-fraud Policy</p>		<p>Date of Issue: 23/02/2024 Page: 5 of 5</p>

Reporting and Complaints

Complaints and reports regarding bribery or unethical behavior are managed according to HPI’s Whistleblowing Policy, which covers confidentiality, data protection, record keeping, and ensures protection against retaliation regarding reports / complaints.

Monitoring and Control

A designated executive is responsible for:

- Acting as a point of contact for staff and collaborators regarding emerging issues and policy-related questions
- Managing annual ethics and anti-bribery training
- Overseeing the complaints and investigation process according to the Anti-Bribery Management System
- Supervising legal and regulatory updates and compliance for anti-bribery matters.

Policy Approval and Review

The Anti-Bribery Policy is approved by HPI’s Board, communicated to all employees and project partners, and published on both the HPI’s website and internal server. The Anti-Bribery policy is reviewed annually and updated as necessary to ensure alignment with regulations, organizational practices, and our scale of operations.

Chair of the Board of Directors
Professor Souliotis Kyriakos

