



Anti – Bribery Policy of Syn Innovation

Document Number: SYN ABMS_01

Version: 1.0

Date: 04/06/2024

Anti – Bribery Policy

a) Purpose

Syn Innovation is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including Greece's anti-bribery laws, EU anti-corruption regulations, and ISO 37001 standards. This policy aims to prevent, detect, and address bribery and corruption within the company's operations and its interactions with stakeholders, including government officials, healthcare professionals, suppliers, and third-party agents.

b) Scope

- All employees, directors, officers, and shareholders of Syn Innovation.
- Third parties acting on behalf of the company, including agents, consultants, suppliers, distributors, and contractors.
- Any other individuals or organizations interacting with Syn Innovation in the context of business activities in Greece and abroad.

c) Context

Commitment to Anti – Bribery Standards

The company adopts a zero-tolerance approach to bribery and corruption and is committed to:

- Ensuring compliance with Greek anti-corruption laws and international laws.
- Implementing, maintaining, and continually improving an Anti-Bribery Management System (ABMS) in accordance with ISO 37001.
- Ensuring all employees and third parties understand their responsibilities under this policy.



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Prohibition of Bribery

Employees and third parties acting on behalf of Syn Innovation are prohibited from:

- Offering, giving, or receiving bribes, kickbacks, or improper payments
- Engaging in facilitation payments to government officials or regulatory authorities.

Gifts and Hospitality

- Modest gifts and hospitality may be offered or accepted if they are transparent, reasonable, and appropriate for the circumstances
- All gifts and hospitality must be recorded in the company's gift register and approved by the Anti-Bribery Compliance Officer (ABCO).
- Lavish gifts, entertainment, or hospitality aimed at influencing business decisions are strictly prohibited.

Third – party Relationships

- Due diligence must be conducted on all third-party agents, suppliers, and distributors before engaging in business with them.
- Contracts with third parties must include clear anti-bribery clauses and outline consequences for non-compliance.
- Third parties are required to follow the company's anti-bribery standards when representing Syn Innovation.

Interaction with Government Officials and Healthcare Professionals

- All interactions with government officials, healthcare professionals, and regulators must be transparent and in full compliance with local and international laws.
- Relationships with healthcare professionals must be ethical and comply with applicable laws, including Greek and EU regulations on transparency and conflicts of interest.



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Reporting and Whistleblowing

- Employees and third parties are encouraged to report any suspicions or knowledge of bribery or corruption through the company's secure whistleblowing channels.
- Reports will be treated confidentially, and employees who report in good faith will be protected from retaliation.
- The Anti-Bribery Compliance Officer (ABCO) will be responsible for investigating all reports of bribery and taking appropriate action.

Due Diligence and Risk Assessment

- The company will perform regular bribery risk assessments, especially in high-risk areas such as procurement, interactions with healthcare professionals, and third-party relationships.
- Enhanced due diligence is required when engaging with third parties or conducting business in regions or sectors with a higher risk of corruption.

Training and Awareness

- All employees, including senior management and high-risk personnel, must undergo anti-bribery training to understand their responsibilities under this policy.
- Training programs will be updated regularly to reflect changes in bribery laws, regulations, and risks.
- Third parties acting on behalf of Syn Innovation will also be required to complete anti-bribery training where appropriate.

Monitoring, Auditing, and Continuous Improvement

- The Anti-Bribery Compliance Officer (ABCO) will monitor compliance with this policy through regular audits, reviews, and assessments.
- Any breaches of the policy will be investigated, and appropriate disciplinary action will be taken, including termination of employment or contracts.



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- The company will review this policy annually to ensure its continued relevance and effectiveness in preventing bribery.

Consequences of Non-Compliance

- Violations of this policy by employees may result in disciplinary actions, including dismissal.
- Third parties who fail to comply with this policy will face contract termination and may be reported to relevant authorities.
- The company reserves the right to pursue legal action against individuals or entities involved in bribery or corruption.

Anti-Bribery Compliance Officer (ABCO)

- Syn Innovation has appointed an Anti-Bribery Compliance Officer (ABCO) responsible for overseeing the implementation and enforcement of this policy.
- The ABCO is responsible for reporting regularly to senior management on the effectiveness of the Anti-Bribery Management System and any bribery-related incidents.

Communication of the Policy

This policy will be communicated to all employees, third parties, and stakeholders through internal communications, and official company channels.

The policy will be publicly available on the company's website and updated as necessary to reflect any changes in law or business practices.



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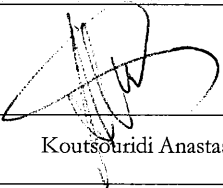

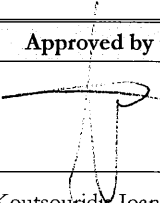
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d) Revision History

Version	Date	Revision Description	Revised By
1.0	04/06/2024		

e) Signatures

	Written by	Reviewed by	Approved by
Signature:			
Name:	Koutsouridi Anastasia	Thalasselis Savvas	Koutsouridis Ioannis
Title:	ABCO	General Manager	President
Date:	27/05/2024	27/05/2024	04/06/2024

