

## Anti-Corruption and Anti-Bribery Policy

At **Cactus Hotels SA**, we are committed to upholding the highest standards of ethics and integrity in all our business activities. Corruption and bribery are strictly prohibited and will not be tolerated under any circumstances.

- **Zero Tolerance:** Any form of corruption or bribery is explicitly forbidden, whether it involves public officials or private entities.
- **Gifts and Hospitality:** The offering or acceptance of gifts, hospitality, or other benefits that could influence decision-making is not permitted.
- **Transparency in Transactions:** All transactions must be transparent and properly recorded in accordance with legal and accounting requirements.
- **Reporting Misconduct:** Employees and partners are encouraged to report any suspicious activity through secure and confidential communication channels.
- **Legal Compliance:** All our operations comply with national and international anti-corruption laws.

Compliance with this policy is the responsibility of all our employees and partners. Any violation may result in disciplinary or legal consequences.

Sincerely,

*Nikos Chalkiadakis*  
CEO of Cactus Hotels SA

