

Anti-Bribery Policy & Culture

We at KeV, state zero tolerance to all forms of Active and Passive Bribery and “Prohibits bribery in any form, either monetary or other forms of payment, indirect or direct (provision of business opportunities, jobs, favorable contracts, donations, travel, gifts and hospitality) for the purpose of obtaining or maintaining or securing (inappropriate) advantage for KeV”.

In this context, the requirements of the ISO 37001:2016 “Anti-Bribery Management System” standard have been integrated into our Quality System and KeV is committed to adherence thereto.

At the same time, we have adopted an anti-bribery culture that reaffirms its commitment to the elimination and prevention of bribery in all its forms. This demonstrates a set of core values that promote an environment of transparency and accountability, not mere compliance with legal and regulatory requirements. Moreover, KeV expects and applies a proactive approach so as to embed ethical behavior at all levels based on its principles:

- **Transparency:** This is the cornerstone of the KeV’s Anti-Bribery culture. We encourage open communication, disclosure of financial information and transactions and set clear procedures for investigation and decision making. Our employees and business partners are aware of the consequences of engaging in unethical transactions.
- **Integrity:** KeV provides moral and ethical standards at work by selecting leaders who foster an appropriate environment and encourage employees to comply with those.
- **Accountability:** We are committed to ethical conduct and set out safeguards for whistle-blowers, ensure holding them harmless of any consequences and specify clear sanctions for offenders.

The Anti-Bribery prevention measures are reflected within the Integrated Quality Management System procedures and are as follows:

- Identification of Bribery risks.
- Compliance with the Bribery-related Legislative and Regulatory framework.
- Implementation of policies and rules to ensure ethical transactions.
- Regular Review of Policy suitability for KeV’s purposes.
- Specification of Anti-Bribery objectives.
- Due Diligence checks on staff and business partners involved.
- Ongoing staff training aiming to prevent bribery and encourage incident reporting.
- Protection for whistle-blowers.
- Ensuring the independence and impartiality of the Anti-Bribery Officer.
- Provision of an anonymous report mechanism.
- Impartial investigation of Bribery incidents and sanction enforcement on parties involved.

Top Management regularly reviews system principles and quality objectives aiming to continuous improvement while it is also committed to provide the necessary resources for compliance to and implementation of the Anti-Bribery System.

It is KeV/s responsibility to ensure that the Anti-Bribery Policy is communicated, understood and implemented by all our employees and business associates.

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