

ANTI-BRIBERY POLICY

SCYTALYS S.A.'s mission is to conduct its domestic and international defense business with integrity, transparency, and full compliance with applicable anti-bribery laws and regulations. The Company is firmly committed to preventing bribery in all its forms and to upholding the highest ethical standards across all its global operations.

As a Company operating in the defense and security sector, SCYTALYS recognizes the heightened exposure to bribery risks associated with government and military contracts, export-controlled technologies, international tenders, and the engagement of intermediaries. The Company applies a zero-tolerance approach to bribery and corruption.

In order to achieve its mission, the Company has established and maintains an Anti-Bribery Management System (ABMS), in line with the requirements of ISO 37001:2025 and all applicable statutory and regulatory obligations in the countries where it operates. The Anti-Bribery objectives are effectively accomplished through the Company's integrated management systems, where all relevant business processes are defined, monitored, controlled, and continuously improved. These objectives address bribery risks and opportunities as determined by Executive Management through systematic risk assessment.

SCYTALYS' anti-bribery strategy consists of the following key elements:

Zero Tolerance and Ethical Conduct

SCYTALYS strictly prohibits offering, promising, giving, requesting, accepting, or authorizing any form of bribe, whether directly or indirectly through third parties. Facilitation payments, kickbacks, improper commissions, or any financial or non-financial advantage intended to improperly influence a decision are strictly forbidden. No business opportunity or competitive pressure justifies deviation from this principle.

Leadership Commitment and Governance

Top Management demonstrates active leadership and commitment to the Anti-Bribery Management System by ensuring adequate resources, defining responsibilities, and promoting a culture of integrity. The Anti-Bribery Compliance Function operates with independence and authority, reporting directly to Top Management and, where applicable, to the Board of Directors.

Risk Management

SCYTALYS systematically identifies, assesses, and evaluates bribery risks related to country exposure, sector activities, government interactions, third-party engagements, and contractual arrangements. Appropriate preventive and mitigation measures are implemented and regularly reviewed to ensure effective risk control.

Third-Party Integrity

SCYTALYS applies risk-based due diligence prior to engaging agents, consultants, subcontractors, distributors, or other business associates. All third parties acting on behalf of the Company are

required to comply with anti-bribery obligations, supported by contractual clauses and monitoring mechanisms.

Human Resources and Awareness

SCYTALYS promotes a culture of ethical behavior by providing appropriate anti-bribery training and awareness to its personnel, particularly those in high-risk positions such as sales, procurement, program management, and export compliance. Employees are encouraged to raise concerns in good faith without fear of retaliation. The Company ensures a secure and confidential reporting mechanism.

Financial and Operational Controls

SCYTALYS maintains robust financial and non-financial controls to prevent bribery, including segregation of duties, authorization controls, transparent accounting practices, and regular internal audits. All transactions are accurately recorded and supported by appropriate documentation.

Customer and Stakeholder Confidence

SCYTALYS ensures that its relationships with Customers, governmental authorities, partners, and other Interested Parties are conducted with integrity and transparency. The Company maintains clear communication and accountability throughout the lifecycle of its projects, safeguarding public trust and national security interests.

Continuous Improvement

SCYTALYS is committed to the continuous improvement of its Anti-Bribery Management System through monitoring, internal audits, management reviews, corrective actions, and periodic reassessment of bribery risks. Lessons learned and best practices are incorporated to enhance system effectiveness.

This Anti-Bribery Policy is communicated and understood at all levels of the Company and is available to relevant Interested Parties. SCYTALYS supports any employee or business associate who refuses to engage in bribery, even if such refusal may result in the loss of business opportunities.

Integrity is a fundamental condition of employment and partnership with SCYTALYS S.A.

George Menexis
Chief Executive Officer
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