Approved by the Resolution No: 30 of the Supervisory Board of Veolia Djur Closed Joint Stock Company of 29 January, 2026

ANTI-BRIBERY POLICY

VEOLIA DJUR CLOSED JOINT STOCK COMPANY

January 2026

Contents

1. Version Management 3
2. Abbreviations 3
3. Purpose of the Policy 3
4. Interested Parties (Stakeholders) 4
5. Scope of the Policy 4
6. Policy Statement 5
7. Leadership and Responsibility 6
8. Reporting of Concerns and Protection from Retaliation 7
9. Consequences of Breach 7
10. Training and Awareness 7
11. Availability, Communication, and Review 8
12. Implementation of the Anti-Bribery Management System 8

1. Version Management

Policy Name:	ANTI-BRIBERY POLICY
Author:	VEOLIA DJUR CLOSED JOINT STOCK COMPANY
Date of Adoption:	02 February 2026
Version No:	1.01.
Authorized by:	Supervisory Board
Responsible Person:	General Director

2. Abbreviations

ABMS	Anti-Bribery Management System
ABP	Anti-Bribery Policy
ABO	Anti-Bribery Officer or Compliance Officer, responsible for ABMS oversight
Bribe	Offering and/or receiving a bribe as defined by the respective articles of the Criminal Code of Armenia[1]
Company	VEOLIA DJUR Closed Joint Stock Company

3. Purpose of the Policy

The purpose of this ABP is to affirm the commitment of the Company to prevent, detect, and address bribery in all its activities. The Company adopts zero-tolerance approach to bribery and commits to establishing, implementing, maintaining and continually improving ABMS in accordance with ISO 37001:2025 and applicable Armenian legislation. In doing so, the Company seeks to protect the legitimate interests of its Interested Parties and to maintain trust with employees, business partners, clients, public, public authorities and other relevant stakeholders defined in the Policy.

The Company strictly prohibits any form of bribery, facilitation payment, or any other form of corruption or similar behavior.

[1] Criminal Code of the Republic of Armenia No: 199-N, in force as of 21.12.2025, including articles 272 and 273

4. Interested Parties (Stakeholders)

Interested parties shall include, and the Policy shall apply to the following internal and external stakeholders, for whom the Company determines and periodically reviews the relevant requirements and expectations when implementing, maintaining, and improving ABMS.

- **Shareholders:** individuals or entities having ownership interest in the company.
- **Governing Bodies and Top Management:** persons responsible for strategic direction and oversight as provided in the Charter of the Company.
- **Employees and Personnel**- including managers, permanent staff, and temporary staff employed based on employment contracts or civic contracts, or service provisions contracts.
- **Business Associates:** suppliers, contractors, subcontractors, consultants, agents, intermediaries, partners, and other third parties acting for or on behalf of the Company.
- **Customers and Clients:** recipients of the Company`s goods or services.
- **Public Authorities and Officials:** State and municipal bodies, regulators, supervisory authorities, and public officials interacting with the Company, including PEPs as defined in the Law of the Republic of Armenia on Combating Money Laundering and Terrorism Financing.
- **Financial and non-financial institutions:** banks, auditors, insurers, and other counterparties.
- **Law Enforcement Authorities:** authorities responsible for oversight, investigation, or enforcement of anticorruption and related laws.
- **Local Communities:** communities affected by the operations of the Company.

5. Scope of the Policy

The Policy covers all activities, operations and business processes carried out by the Company, including:

- Commercial, contractual, and procurement activities.
- Interactions with customers, suppliers, contractors, consultants, intermediaries, and other business associates.
- Participation in tenders, negotiations, licensing, permitting, tax and regulatory inspections, and administrative procedures.
- Financial, accounting, payment, and record-keeping activities.
- Sponsorship, donations, hospitality, gifts, and other benefits.
- Any other activities that may expose the Company to bribery risk.

The Policy applies to all persons acting for or on behalf of the Company, including:

- Members of governing bodies and top management.
- All employees, regardless of position, function, or employment status.
- Temporary staff and individuals engaged under civil law or service contracts.
- Business associates, where they act on behalf of, represent, or perform services for the company.

The scope of the Policy applies to the Company`s activities within the territory of the Republic of Armenia, and to any activities conducted outside Armenia, where such activities are performed on behalf of or for the benefit of the Company.

The ABMS applies irrespective:

- The value or nature of the transaction.
- Whether the interaction is with a public or a private organization.
- Whether the benefit is of a financial or a non-financial nature.

6. Policy Statement

Company prohibits bribery in all its forms, whether direct or indirect, facilitation payment, influence peddling, or any other corrupt or similar conduct, regardless of value involved or the identity of persons concerned.

The Company commits to full compliance with the relevant laws and regulations of the Republic of Armenia and the relevant regulatory and contractual obligations applicable to its activities. The Company established the Policy as the foundation for setting, implementing, reviewing and achieving its anti-bribery objectives and for ensuring that bribery risks are identified, assessed and effectively managed.

The Company encourages all Shareholders/Owners, Governing Bodies and Top Management, Employees and Personnel, Business Associates, Customers and Clients, Local Communities and other Stakeholders to raise concerns in good faith regarding actual or suspected bribery and other violations of this Policy and ensures that appropriate reporting channels are available and accessible in accordance with Procedures established by the Company.

The Company strictly prohibits retaliation, discrimination, or disciplinary action against any person who refuses to participate in bribery or reports a concern in good faith. The Company commits to the continual improvement of ABMS by monitoring its effectiveness, conducting internal audits and management reviews, and implementing corrective actions where necessary.

7. Leadership and Responsibility

Commitment of Top Management:

Top management of the Company demonstrates leadership and commitment to ABMS by:

- Approving and supporting ABP, as well as related procedures designed to implement ABP.
- Ensuring that anti-bribery requirements are integrated into the Company's governance, business processes, and decision-making.
- Promoting a culture of integrity, transparency, and zero tolerance toward bribery.
- Ensuring that adequate financial, human, and organizational resources are available for the effective implementation and operation of ABMS.
- Supporting personnel who refuse to engage in bribery, even where such refusal may result in adverse commercial consequences.
- Ensuring that ABMS achieves its intended objectives and is subject to periodic review and continual improvement.
- Appointing an ABO with appropriate authority, independence, competence, and access to information, and supporting the ABO in the performance of duties.

ABO is responsible for overseeing the implementation, maintenance and effectiveness of the ABMS, including:

- Has responsibility and authority to advise management and employees on Anti-Bribery matters.
- Oversee the identification and assessment of bribery risks, in accordance with Procurement Procedure-Risk Assessment Procedure and Vendor Eligibility Assessment Form, as well as other procedures adopted by the Company
- Monitors the implementation of anti-bribery controls and procedures.
- Receives and oversees the handling of reports relating to bribery concerns.
- Reports on the performance of the ABMS to top management.

8. Reporting of Concerns and Protection from Retaliation

The Company encourages all employees, managers, and other persons acting on behalf of the Company to report, in good faith, any actual or suspected bribery, violations of this Policy, or other unethical conduct.

The Company ensures that appropriate reporting channels are established and accessible, allowing concerns to be raised confidentially and, where permitted by law, anonymously.

The Company strictly prohibits any form of retaliation, discrimination, or disciplinary action against any person who:

- Refuses to participate in bribery or other corrupt practices; or
- Reports a concern in good faith.

even where such refusal or reporting may result in loss of business or other adverse commercial consequences.

All reports are handled in a fair, confidential, and impartial manner in accordance with Compliance Alert and Whistleblowing Procedure adopted by the Company.

9. Consequences of Breach

Any violation of this Anti-Bribery Policy, applicable anti-bribery procedures, or relevant legal requirements may result in appropriate disciplinary, contractual, or other measures, in accordance with applicable laws and Company procedures.

Such measures may include, as applicable:

- Disciplinary action against employees.
- Termination or suspension of contractual relationships with business associates.
- Reporting to competent authorities where required by law.

The application of measures shall be proportionate to the nature and seriousness of the violation.

10. Training and Awareness

The Company ensures that appropriate anti-bribery training and awareness activities are provided to personnel, taking into account their roles, responsibilities, and exposure to bribery risks.

Anti-bribery training and awareness activities are designed to ensure that personnel understand:

- The requirements of this Policy.
- Applicable anti-bribery laws and regulations.
- How to recognize and respond to bribery risks; and
- How to report concerns in good faith.

The ABO supports and oversees training and awareness activities in accordance with applicable procedures.

11. Availability, Communication, and Review

This ABP is approved by the Company's top management and is maintained as documented information.

The Policy is communicated to all employees and made available to relevant Interested Parties, as appropriate.

The Policy is reviewed periodically and updated where necessary to ensure its continued suitability, adequacy, and effectiveness, taking into account changes in the Company’s activities, risks, legal requirements, and the results of the Anti-Bribery Management System.

12. Implementation of the Anti-Bribery Management System

The Company implements this Anti-Bribery Policy through an Anti-Bribery Management System designed to prevent, detect, and address bribery risks in a proportionate and risk-based manner.

The Anti-Bribery Management System is supported by documented procedures, controls, and records, which include, as appropriate:

- Identification and assessment of bribery risks on a risk-based basis in accordance with procedures and assessment forms of the Company.
- Due diligence on business associates and other relevant third parties.
- Controls relating to gifts, hospitality, donations, sponsorships, and other benefits.
- Mechanisms for reporting, investigating, and addressing actual or suspected bribery.
- Maintenance of relevant records and registers as documented information.

Detailed requirements, processes, and responsibilities are defined in the applicable procedures supporting the Policy.