OTS Single-Member S.A.

Integrated Management System Policies

Organisation	OTS Single-Member S.A.	Status	Active
Title	Integrated Management System Policies	Code	OTS-IMS-POL
Version	1.0	Date	22/06/2026
Document owner	Quality Management Directorate / Management	Approval	Management of OTS Single-Member S.A.
Scope	All organisational units, employees and associates acting on behalf of OTS Single-Member S.A.	Distribution	Internal and controlled external
Reference management systems	ISO 9001, ISO 14001, ISO 45001, ISO 27001, ISO 27701, ISO 20000-1, ISO 22301, ISO 37001, ISO 39001 and ISO 29993	Review	Annual or following a material change

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Contents

This document includes a common policy-application framework and ten revised policies of OTS Single-Member S.A.

Common Policy Application Framework

The policies of the Integrated Management System of OTS Single-Member S.A. are statements of management commitment and establish the principles by which the Company organises, controls and improves its critical operations. Each Policy is applied in conjunction with the approved procedures, work instructions, forms, registers, indicators, objectives and other documented information of the system.

The common framework is based on compliance with legal, regulatory and contractual requirements; the management of risks and opportunities; evidence-based decision-making; clear allocation of responsibilities; continual improvement; and management review. The policies are interrelated and shall be applied in a manner that prevents inconsistencies and strengthens the Company's overall maturity.

Management retains ultimate responsibility for approving, resourcing and reviewing the policies. Directors and managers are responsible for implementation within their areas of responsibility, while the Quality Management Directorate supports consistency, documentation, monitoring, internal communication and the reporting of improvement opportunities. Every employee and associate shall understand and apply the requirements relevant to their role.

The policies are reviewed at least annually and additionally whenever significant changes occur in the business context, legislation, contractual obligations, technological conditions, risks, services or organisational structure of the Company. The review is documented and may result in the revision of objectives, procedures, controls, indicators or resources.

1. Quality Policy

Code	ΔΚ-ΔΔ01-02	Version	3.0
Reference standard	ELOT EN ISO 9001:2015	Owner	Management / Quality Management Directorate
Status	Active	Date	22/06/2026
Scope	Design, development, installation and support of software, smart-city solutions, information-technology projects and SaaS.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. adopts this Quality Policy as the overarching framework of principles for assuring the quality of its products, services and internal operations. The Policy expresses Management's commitment to providing high-value, documented and reliable services that conform to agreed customer requirements, with particular emphasis on serving Local Government bodies, the wider public sector and every organisation that uses the Company's solutions.

Management recognises that quality is not limited to compliance with technical specifications, but extends to the way in which the Company understands customer needs, designs its solutions, manages its projects, responds to support requests, documents its obligations and systematically improves its processes. The Quality Management System therefore operates as a mechanism for governance, control, organisational learning and continual improvement.

Scope

The Quality Policy applies to the design, development, installation and support of software; the design, development, installation and configuration of smart-city solutions; the implementation of information technology projects; and the provision of Software as a Service (SaaS). It covers all organisational units participating in the life cycle of products and services, from understanding the need and preparing the offer through development, configuration, production operation, support and subsequent improvement.

The Policy is binding on Management, directors, managers, members of product teams, delivery, support and account-management teams, and every employee or associate whose work affects the quality of deliverables and the customer experience.

Principles of Quality and Operational Excellence

OTS Single-Member S.A. regards customer satisfaction, consistency in delivery, solution reliability and the maintenance of relationships based on mutual respect as fundamental principles of its operations. Every activity is designed and performed with due regard to compliance with applicable requirements, prevention of failures, evidence-based decision-making and responsible resource management.

The Company seeks to understand not only current customer needs but also future requirements arising from institutional, technological, organisational and operational change. Continuous customer

contact, the assessment of complaints and feedback, performance-indicator analysis and the systematic capture of knowledge from projects and support activities are integral elements of the Company's quality approach.

The development of new products, the enhancement of existing solutions and the provision of delivery and support services shall be based on controlled processes, clearly defined roles, appropriate documentation, risk assessment and adequate acceptance controls. Quality is built into design and is not treated as an after-the-fact inspection activity.

Implementation, Resources and Responsibilities

Management undertakes to provide the organisational infrastructure, human resources, tools, expertise and equipment required for the effective implementation of the Quality Management System. Responsibility for quality is distributed across all levels of the Company, since each employee's work influences the reliability of deliverables, process efficiency and the user experience.

Directors and managers ensure implementation of the procedures within their areas of responsibility, monitor objectives, address deviations in a timely manner and promote a culture of prevention, cooperation and improvement. The Quality Management Directorate supports system consistency, facilitates cross-functional cooperation, monitors documentation and coordinates review, audit and corrective-action processes.

Monitoring, Review and Continual Improvement

The effectiveness of the Quality Policy is monitored through objectives, indicators, internal-audit results, evaluation of nonconformities, customer complaints, project performance, response and resolution times, management-review outcomes and improvement proposals from employees and customers.

Where procedures, workflows or actions are found not to support achievement of established objectives, the responsible persons shall perform root-cause analysis, assess the risk of recurrence and implement appropriate corrective or preventive action. Continual improvement is a standing management requirement rather than an occasional activity.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company's officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____22.06.2026

2. Environmental Policy

Code	ΔΚ-ΔΔ01-03	Version	2.0
Reference standard	ELOT EN ISO 14001:2015	Owner	Management / Environmental Management Officers
Status	Active	Date	22/06/2026
Scope	OTS operations, premises, procurement and services that affect or may affect the environment.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. recognises that, although its business activity is primarily within the information technology and services sector, it is associated with environmental impacts arising from energy and resource consumption, the use of equipment, travel, waste management, procurement and the operation of its premises. Through this Environmental Policy, the Company undertakes to operate responsibly, prevent pollution and systematically improve its environmental performance.

Management regards environmental protection as part of the broader corporate responsibility and sustainable development of OTS Single-Member S.A. Environmental considerations are integrated into management processes, procurement decisions, infrastructure management, everyday working practices and, where feasible, the design of services that support more efficient customer operations and reduce unnecessary use of resources.

Scope

This Policy applies to all premises, organisational units and activities of OTS Single-Member S.A. that may generate direct or indirect environmental impacts. It includes the use of electricity, water, paper and other consumables; the management of electronic equipment and waste; employee travel; supplier selection; and employee environmental awareness.

The Policy applies to employees, officers, associates and suppliers acting within or on behalf of the Company, to the extent that their actions affect the environmental aspects of OTS Single-Member S.A. and the achievement of its environmental objectives.

Environmental Management Principles

OTS Single-Member S.A. undertakes to comply with applicable environmental legislation, regulatory requirements and any other commitments assumed towards customers, authorities or interested parties. Compliance is treated as the minimum operating requirement and is supplemented by preventive, measurement and improvement actions.

The Company seeks to reduce resource consumption through the rational use of energy and materials, the limitation of unnecessary printing, the promotion of digital workflows, reuse where feasible and the recycling of suitable materials. Waste is managed in accordance with the hierarchy of prevention, reuse, recycling and lawful final disposal, with particular attention to electrical and electronic equipment.

When procuring goods and services, environmental criteria are considered where appropriate, including energy efficiency, service life, maintainability, recyclability, responsible disposal and supplier compliance with relevant requirements. The Company seeks to cooperate with customers and suppliers in order to strengthen environmental responsibility throughout the value chain.

Implementation, Awareness and Control

Management ensures the provision of appropriate resources, internal communication of the Policy and employee understanding of environmental obligations. Employees are encouraged to apply resource-saving practices, participate in improvement initiatives and report opportunities to reduce environmental impacts.

The relevant procedures provide for the identification of environmental aspects, assessment of environmental impacts, establishment of objectives and indicators, monitoring of resource consumption and management of deviations. The Company maintains mechanisms for identifying new or amended legal requirements and assesses whether its practices need to be adapted.

Monitoring, Review and Improvement

Environmental performance is evaluated through measurable data, including energy and consumables consumption, recycling rates, audit results, compliance with waste-management requirements and progress against environmental objectives. Results are periodically analysed and used to support management decisions.

The Environmental Policy and Environmental Management System are reviewed at least annually and whenever significant changes occur in the Company’s activities, premises, requirements or environmental aspects. Continual improvement of environmental performance is a standing Management commitment.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company’s officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____22.06.2026__

3. Occupational Health and Safety Policy

Code	ΔΚ-ΔΔ01-04	Version	2.0
Reference standard	ELOT ISO 45001:2018	Owner	Management / Safety Officer / Occupational Physician / QMD
Status	Pending approval	Date	22/06/2026
Scope	Workplaces, office activities, travel, work at customer premises and other activities under OTS control.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. recognises its responsibility to provide a safe and healthy working environment for all employees, associates, visitors and other persons operating on its premises or under its control. This Occupational Health and Safety Policy establishes the principles by which the Company prevents occupational accidents, work-related ill health and any injury or impairment of health that may be associated with work.

Management is committed to eliminating hazards where feasible, reducing occupational health and safety risks to acceptable levels, continually improving the Occupational Health and Safety Management System and fostering a culture of prevention, participation and transparent reporting. The pursuit of zero accidents is an ongoing management objective and requires accountability at individual, team and organisational level.

Scope

The Policy applies to all premises of OTS Single-Member S.A., office activities, meetings, training sessions, business travel, work at customer premises and every activity performed by employees or associates in the course of their work.

Its application takes into account risks specific to an information-technology organisation, including ergonomic risks, psychosocial factors, workload, display-screen equipment, electrical hazards, fire safety, safe evacuation, road travel and safe working at third-party premises.

Prevention and Protection Principles

OTS Single-Member S.A. complies with applicable occupational health and safety legislation, the requirements of ISO 45001 and any other obligation arising from contracts, regulations or interested-party requirements. Compliance is supported through systematic hazard identification, risk assessment, implementation of preventive measures and monitoring of their effectiveness.

The Company applies the hierarchy of controls, seeking first to eliminate hazards, then to substitute or reduce exposure through organisational and technical measures, and, where necessary, to use appropriate instructions, training and protective equipment. Particular emphasis is placed on safe workplace design, ergonomics, fire prevention, emergency preparedness and the protection of employees' physical and psychosocial well-being.

Reporting of hazards, incidents, near misses and improvement proposals is actively encouraged. The Company ensures that reports are objectively investigated, root causes are identified and

corrective or preventive measures are taken, without a blame culture where reports are made in good faith.

Participation, Consultation and Training

Employee participation is a central prerequisite for effective occupational health and safety management. The Company consults employees and competent statutory roles, uses employee experience in identifying hazards and provides timely information about changes that may affect the working environment.

OTS Single-Member S.A. provides appropriate occupational health and safety information and training according to role, job position and level of risk exposure. Training covers basic safe-working obligations, emergency procedures, correct use of equipment, ergonomic practices, safe travel and incident reporting.

Monitoring, Inspection and Improvement

Implementation of the Policy is monitored through periodic inspections, incident reports, evaluation of corrective actions, compliance checks, employee training and analysis of health and safety indicators. Management reviews the results and ensures that objectives remain appropriate to the nature, scale and risks of the Company.

Systematic inspection of the organisation, premises, equipment and procedures contributes to accident prevention and the maintenance of a high level of safety. Each deviation is addressed through documented root-cause analysis and measures intended to prevent recurrence.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company's officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	__22.06.2026_____

4. Information Security Policy

Code	ΔΚ-ΔΔ01-01	Version	3.0
Reference standard	ISO/IEC 27001:2022	Owner	Management / Information Security Officer / QMD
Status	Active	Date	22/06/2026
Scope	OTS information, systems, applications, infrastructure, SaaS services, projects and processes.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. recognises that the information it creates, stores, processes, transmits or hosts is a critical business asset and a fundamental prerequisite for customer trust, uninterrupted service delivery and compliance with contractual, legal and regulatory obligations. Through this Information Security Policy, Management establishes the framework for protecting the confidentiality, integrity and availability of information.

The Company undertakes to implement, maintain and continually improve an Information Security Management System conforming to ISO/IEC 27001:2022 and adapted to the nature of its services, the operation of its applications, public- and private-sector requirements, cybersecurity risks and technological developments.

Scope

The Policy applies to the design, development, installation and support of software; the design, development, installation and configuration of smart-city solutions; the implementation of information technology projects; and the provision of Software as a Service (SaaS), as well as to all internal and external processes affecting information security. It covers customer data, business data, personal data, source code, documentation, contracts, credentials, production, test and development systems, cloud infrastructure, workstations, networks, storage media and third-party services.

The Policy is binding on all employees, officers, associates, subcontractors and providers who obtain access to information or information systems of OTS Single-Member S.A. or its customers. Access to information is granted only to the extent necessary for the performance of assigned duties and is subject to controls, acceptable-use rules and confidentiality obligations.

Information Protection Principles

OTS Single-Member S.A. applies a risk-based approach to identify, assess and treat threats that may affect information security. Security controls are designed according to the importance of information assets, business impacts, contractual requirements, personal-data protection obligations and recognised security practices.

Confidentiality is safeguarded through controlled access, authentication, authorisation, segregation of duties, appropriate management of access rights and confidentiality obligations. Integrity is supported through change controls, secure development, activity logging, protection against unauthorised modification and quality-control procedures. Availability is ensured through appropriate

infrastructure, backups, monitoring, incident management and alignment with business-continuity requirements.

Security is integrated throughout the life cycle of projects, applications and services. Design, development, changes, testing, production deployment and support shall take account of secure-coding, data-protection, vulnerability-management, logging, monitoring and secure-configuration requirements.

Compliance, Awareness and Incidents

The Company complies with applicable Greek and European Union legislation, personal-data protection requirements, contractual commitments to customers and its internal security policies. Employees are informed of their obligations and receive appropriate training so that they can identify risks, apply secure practices and promptly report incidents or suspicious activity.

Every incident or indication of an information-security breach is handled through a structured process of reporting, assessment, containment, investigation, recovery and lessons learned. Prompt reporting is mandatory and protects the Company, its customers and interested parties from escalating impacts.

Monitoring, Review and Improvement

The effectiveness of the Information Security Management System is monitored through risk assessments, internal audits, incident monitoring, control results, security indicators, testing, access reviews, supplier evaluations and management review.

Where existing procedures or technical controls are insufficient to achieve security objectives, the Company revises its risk assessment, establishes corrective actions and strengthens the necessary measures. Continuous alignment with technological development, the threat landscape and customer needs is a core Management commitment.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company’s officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____22.06.2026

5. Information Technology Service Management Policy

Code	ΔΚ-ΔΔ01-08	Version	2.0
Reference standard	ISO/IEC 20000-1:2018	Owner	Management / Quality Management Directorate / IT Service Teams
Status	Active	Date	22/06/2026
Scope	Information technology services designed, delivered, operated, supported and improved by OTS.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. adopts this Information Technology Service Management Policy as the framework for designing, delivering, operating, monitoring and continually improving the information technology services provided to its customers. The Policy is intended to ensure reliable, consistent, controlled and measurable services in accordance with agreed requirements, service levels and customers' business needs.

Management recognises that IT service management is a critical mechanism for delivering business value, particularly where services support public bodies, critical operations, large user populations and availability requirements. The Policy is aligned with ISO/IEC 20000-1:2018 and operates in synergy with the quality, information-security and business-continuity management systems.

Scope

The Policy applies to all information technology services provided by OTS Single-Member S.A., including installation, configuration, operational support, request management, incident resolution, technical support, SaaS services, information-technology project services and services associated with smart-city solutions.

The scope includes all organisational units participating in the service life cycle, including sales, presales, product, delivery, account management, support, IT, cloud and quality-management functions, as well as associates or suppliers contributing to customer service delivery.

Service Management Principles

Services are designed and delivered through a customer-focused approach, based on a clear understanding of business needs, contractual commitments, service-level requirements and user expectations. The Company seeks to maintain transparent communication with customers, document service agreements and monitor actual performance against its commitments.

Service-management decisions are based on data, indicators, trends and root-cause analysis. Response times, restoration times, SLA compliance, recurring incidents, customer satisfaction, availability, capacity and communication quality are evaluated in order to identify improvement opportunities.

The Company manages incidents, requests, problems, changes, configurations, availability, capacity and suppliers in a controlled manner. Each service shall have a clearly defined business purpose, responsibilities, escalation procedures, documentation requirements and a mechanism for monitoring effectiveness.

Continuity, Risks and Change Control

OTS Single-Member S.A. integrates risk management into IT services in order to identify, in a timely manner, factors that may affect service availability, performance, security, compliance or quality. Risk assessment is linked to business-continuity, information-security and change-management processes.

Changes to services, applications, infrastructure, configurations or operating processes are implemented in a controlled manner, with impact assessment, appropriate approval, an implementation plan, testing, communication to affected parties and rollback capability where required. The objective is to achieve improvement without unjustified risk to service stability.

Monitoring, Review and Improvement

Service performance is monitored through defined objectives, indicators and reports presenting service status, deviations, trends and corrective actions. Results are used by Management, directors, support teams and the Quality Management Directorate to coordinate improvements.

Service review includes evaluation of SLA compliance, analysis of recurring problems, the quality of customer communication, the effectiveness of cross-team cooperation, supplier performance and resource adequacy. The Company implements corrective and preventive actions to increase the reliability and maturity of its services.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company’s officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	22.06.2026

6. Business Continuity Policy

Code	ΔΚ-ΔΔ01-05	Version	2.0
Reference standard	ISO 22301:2019	Owner	Management / Business Continuity Team / QMD
Status	Pending approval	Date	22/06/2026
Scope	OTS critical business activities, services, infrastructure, human resources and dependencies.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. recognises that the ability to continue critical activities during a disruption is an essential prerequisite for reliability, contractual consistency and the protection of customer trust. Through this Business Continuity Policy, the Company establishes the prevention, preparedness, response and recovery framework required to maintain its critical services at an acceptable level.

Management undertakes to implement a Business Continuity Management System conforming to ISO 22301:2019, taking into account the Company's business context, customer needs, technological dependencies, disruption risks, compliance obligations and the need for rapid recovery following events that may affect personnel, premises, systems, services or suppliers.

Scope

The Policy applies to the critical business activities of OTS Single-Member S.A.; the development, implementation, operation and support of information-technology solutions; SaaS services; the infrastructure supporting service delivery; premises; human resources; suppliers; and external dependencies that may affect business continuity.

The Policy covers disruptions of different types and levels of severity, including loss of access to premises, cyber incidents, infrastructure failures, telecommunications outages, cloud-provider failures, loss of critical personnel, natural events, travel disruption and any event that may prevent critical processes from being performed within acceptable timeframes.

Business Continuity Principles

The Company bases its Business Continuity Management System on business impact analysis, risk assessment and the establishment of recovery priorities. Critical activities, minimum operating requirements, recovery time objectives and dependencies are documented, reviewed and used to design appropriate continuity strategies.

Business continuity is not treated solely as a technical matter, but as an organisational capability requiring clear roles, alternative procedures, employee preparedness, adequate communication, tested plans, information protection and coordination among Management, technical teams, support teams and customer-facing functions.

OTS Single-Member S.A. seeks to systematically avoid single points of failure, strengthen the resilience of critical systems, maintain backups, document recovery procedures, provide adequate

alternative access to tools and information, and preserve the ability to communicate with customers, employees and associates during a crisis.

Preparedness, Response and Recovery

The Company maintains business-continuity and recovery plans that are activated according to the nature and severity of the disruption. The plans include procedures for incident assessment, escalation, decision-making, communication, service recovery, temporary workarounds and return to normal operations.

The effectiveness of the plans is strengthened through training, exercises, tests, reviews following actual or simulated incidents, and updates whenever services, infrastructure, roles, suppliers or customer requirements change.

Monitoring, Review and Improvement

Business continuity is monitored through preparedness indicators, test results, incident reporting, assessment of critical dependencies, compliance with recovery objectives, service availability and the effectiveness of corrective actions. Management reviews the results and ensures that resources, strategies and plans remain adequate.

Following each significant disruption or test, the Company evaluates its response, identifies improvement opportunities, revises plans and procedures and strengthens organisational resilience. Continual improvement of the Business Continuity Management System is the responsibility of Management and all functions involved.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company’s officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____

7. Anti-Bribery Policy

Code	ΔΚ-ΔΔ01-06	Version	2.0
Reference standard	ELOT EN ISO 37001:2025 and the applicable anti-bribery framework in force	Owner	Management / Anti-Bribery Compliance Function / QMD
Status	Active	Draft date	22/06/2026
Scope	All business activities, transactions, tenders, procurement, partnerships and relationships with the public or private sector.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. is committed to operating lawfully, ethically and with integrity and respect towards society, customers, associates and employees. The Company applies zero tolerance to bribery, corruption and any practice that may create an improper advantage, conflict of interest, lack of transparency or damage to its reputation.

This Anti-Bribery Policy establishes the framework for preventing, deterring, detecting, reporting and addressing bribery risks. Management undertakes to implement an Anti-Bribery Management System conforming to ISO 37001 and adapted to the business environment of OTS Single-Member S.A., its relationships with public bodies, participation in tender procedures, contract management and cooperation with suppliers, subcontractors and other third parties.

Scope

The Policy applies to all activities of OTS Single-Member S.A. and is binding on Management, officers, employees, external associates, suppliers, subcontractors and every third party acting on behalf of the Company or influencing transactions, projects, tenders, sales, procurement, service delivery, financial flows or relationships with public and private organisations.

The scope includes the offering or acceptance of gifts, hospitality or benefits; sponsorships; donations; facilitation payments; dealings with public officials; engagement of third parties; management of conflicts of interest; recruitment; supplier evaluation; and any other act that may create an actual or perceived bribery risk.

Zero-Tolerance and Prevention Principles

OTS Single-Member S.A. expressly prohibits the direct or indirect offering, promising, giving, accepting or requesting of any improper advantage for the purpose of improperly influencing a decision, obtaining or retaining a business advantage, or circumventing rules. The prohibition applies regardless of the value of the advantage, the recipient, the country, the sector or customary market practice.

The Company complies with applicable anti-bribery and anti-corruption legislation, its contractual commitments and internal procedures concerning gifts, hospitality, conflicts of interest, selection and evaluation of third parties, financial controls, tender procedures and reporting of irregularities.

Bribery-risk management is based on documented assessment, controls proportionate to the level of risk, due diligence on third parties, adequate documentation of decisions, segregation of duties, financial transparency and clear approval of higher-risk transactions.

Reporting, Protection and Responsibilities

OTS Single-Member S.A. encourages good-faith reporting of any actual or potential bribery, conflict of interest, improper influence or breach of this Policy. Reports are examined confidentially and objectively, and persons reporting in good faith are protected against retaliation.

Every employee and associate shall avoid situations that may create an actual, potential or perceived conflict of interest, seek guidance where doubt exists, follow approval procedures and refuse any act contrary to this Policy. Managers shall act as role models for integrity and ensure that their teams understand and apply the relevant obligations.

Monitoring, Sanctions and Improvement

Implementation of the Policy is monitored through risk assessments, compliance checks, internal audits, transaction reviews, third-party evaluations, employee training, review of conflict-of-interest declarations and investigation of reports. Results are used to improve controls and strengthen the culture of integrity.

A breach of the Policy may result in disciplinary, contractual or other measures, depending on the seriousness of the incident and the applicable framework. The Company reserves the right to terminate business relationships, notify competent authorities and take any lawful measure necessary for its protection.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company’s officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____22.06.2026

8. Road Traffic Safety Policy

Code	ΔΚ-ΔΔ01-07	Version	2.0
Reference standard	ISO 39001:2012	Owner	Management / / QMD
Status	Active	Draft date	22/06/2026
Scope	Employee business travel, use of company or private vehicles for work and travel to customer premises.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. is committed to contributing to the reduction of road-traffic safety risks associated with its activities and within the Company's ability to influence. This Road Traffic Safety Policy establishes the principles for preventing accidents, injuries and losses that may arise from business travel, customer visits, transport of equipment or the use of vehicles for work purposes.

Management recognises that road-traffic safety is both an individual and collective responsibility. The Company implements a Road Traffic Safety Management System conforming to ISO 39001:2012, with the objectives of complying with legislation, preventing unsafe behaviour, training employees and continually improving related performance.

Scope

The Policy applies to all business travel undertaken by employees or associates of OTS Single-Member S.A., whether by company vehicle, private vehicle, hired vehicle or another means of transport. It includes travel to customer premises, public bodies, training locations, meetings, projects, technical interventions and other work obligations.

Application of the Policy takes into account the characteristics of the Company, including customers distributed throughout Greece, the travel needs of support and delivery personnel, the transport of equipment and the requirement to maintain safe behaviour even under time pressure or increased workload.

Road Traffic Safety Principles

OTS Single-Member S.A. requires full compliance with the Greek Road Traffic Code, all other applicable legal requirements and internal safe-travel instructions. No business objective, project schedule or customer-service requirement justifies conduct that endangers human life, physical integrity or public safety.

Employees who drive for business purposes shall hold a valid and appropriate driving licence, be fit to drive safely, observe speed limits, wear seat belts, refrain from using mobile phones while driving, never drive under the influence of alcohol or substances and plan journeys in a way that limits fatigue and time pressure.

The Company seeks to use suitable, maintained and safe vehicles, assess risks for higher-difficulty journeys, provide timely information on weather or traffic conditions and avoid unnecessary travel where safer alternatives are available, such as videoconferencing or remote support.

Training, Monitoring and Incident Reporting

OTS Single-Member S.A. informs employees and raises awareness of work-related road-traffic risks. Training and communication cover safe driving behaviour, fatigue management, equipment use, route planning, accident reporting and emergency response while travelling.

Every road accident, near miss, infringement or hazardous condition associated with business travel is reported promptly and investigated in order to understand causes and implement preventive measures. Reporting is intended not only to demonstrate compliance, but primarily to support learning and reduce future risk.

Monitoring, Objectives and Improvement

Road-traffic safety performance is monitored through indicators such as the number of incidents and near misses, training completed, driver compliance, vehicle suitability and investigation outcomes. Management evaluates these indicators and initiates improvement actions where required.

The Road Traffic Safety Policy is periodically reviewed and following significant incidents, changes in service delivery, changes in legislation or changes in the Company's travel patterns. The objective is to continually reduce risks and strengthen responsible road behaviour.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company's officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____22.06.2026

9. Learning Services Policy

Code	ΔΚ-ΔΔ01-06	Version	Revised draft
Reference standard	ISO 29993:2017	Owner	Management / OTS Academy / QMD
Status	Pending approval	Draft date	22/06/2026
Scope	Learning services for customers, users, officers and interested parties, together with internal competence development.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. recognises learning as a critical success factor for the proper use of its solutions, effective customer support, employee competence development and the dissemination of know-how. Through this Learning Services Policy, the Company establishes the principles for designing, delivering, evaluating and improving the learning services it provides.

Management undertakes to implement a Learning Services Management System conforming to ISO 29993:2017, so that learning programmes have clear objectives, appropriate content, adequate resources, effective learning outcomes and practical value for participants and their organisations.

Scope

The Policy applies to learning services provided by OTS Single-Member S.A. to customers, system users, officers of customer organisations, associates and other interested parties. It includes training related to the installation, configuration, production use and optimal utilisation of software, smart-city solutions, information-technology projects, SaaS services and other consulting or support services.

The Policy also covers internal training that strengthens employees' ability to deliver high-quality services, comply with management-system requirements, meet regulatory obligations and respond to technological and organisational developments.

Principles for the Design and Delivery of Learning

Each learning service is designed on the basis of participant needs, prior knowledge, business objectives, the subject of the training and expected learning outcomes. Content shall be documented, current, understandable, practically applicable and adapted to the participants' operating environment.

OTS Single-Member S.A. ensures that trainers possess adequate subject-matter knowledge, training competence and understanding of customer needs. The learning process is supported by appropriate materials, examples, instructions, demonstration systems, participation arrangements and feedback mechanisms.

The Company seeks to ensure that learning is not limited to the transfer of information, but leads to genuine ability to apply knowledge. Where feasible, programmes therefore include practical exercises, use cases, treatment of common errors, links to customers' actual processes and opportunities for questions.

Evaluation, Documentation and Improvement

The effectiveness of learning services is evaluated through participant feedback, trainer evaluation, attendance records, verification of learning-objective achievement, monitoring of recurring support questions and assessment of the practical usefulness of training after completion.

Training documentation is retained in a manner that demonstrates the subject, duration, participants, trainer, materials and evaluation results. The Company uses this information to improve training materials, methodology, scheduling and targeting.

Link with Quality, Support and Knowledge

Learning services are directly connected with service quality, successful project implementation and effective support. OTS Single-Member S.A. uses knowledge generated through training, projects and support requests to improve user guides, learning content, configuration procedures and customer-communication practices.

Management encourages continual development of employee skills and systematic awareness of technological, legal and educational developments. Learning is treated as an investment in knowledge, service quality and long-term customer trust.

Approval and Validity

This Policy is a revised version of the corresponding policy of OTS Single-Member S.A. and shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company's officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____22.06.2026

10. Personal Data Protection and Security Policy

Code	ΔΑΠΔ-ΠΟΛ01	Version	2.0
Reference standard	Regulation (EU) 2016/679 (GDPR) and ISO/IEC 27701:2025	Owner	Management / Data Protection Officer / Quality Management Directorate
Status	Active	Draft date	22/06/2026
Scope	Personal-data processing carried out by OTS Single-Member S.A. as controller or processor.	Review	Annual or extraordinary
Relationship with the IMS	Part of the Integrated Management System of OTS Single-Member S.A.	Approved by	Chief Executive Officer / Management

Purpose and Management Commitment

OTS Single-Member S.A. adopts this Personal Data Protection and Security Policy as a framework of management commitment to protecting the privacy, rights and freedoms of natural persons whose data it collects, stores, uses, transfers or otherwise processes. The Policy gives practical effect to the Company's obligation to operate transparently, lawfully, securely and accountably, in accordance with Regulation (EU) 2016/679, applicable national personal-data protection legislation and the ISO/IEC 27701:2025 framework for privacy information management.

Management recognises that personal-data protection is an essential prerequisite for the trust of employees, customers, application users, associates, suppliers and other interested parties. OTS Single-Member S.A. undertakes to provide the resources, procedures, roles, technical and organisational measures and control mechanisms required to protect personal data effectively throughout its life cycle.

The Policy is applied in direct synergy with the Information Security Policy, incident-management procedures, access-control procedures, the development and operation of information systems, the Company's contractual commitments and the Integrated Management System. Privacy is treated as an embedded governance requirement and not as a fragmented or retrospective control.

Scope

This Policy applies to every processing operation involving personal data performed by OTS Single-Member S.A., irrespective of the medium, information system, location, organisational unit or business purpose involved. It covers data relating to employees, job applicants, customers, officers and users of customer organisations, suppliers, associates, visitors, representatives of contracting parties, training participants and any other natural person whose data is processed by the Company.

The Policy covers both situations in which OTS Single-Member S.A. acts as controller by determining the purposes and means of processing, and situations in which it acts as processor on behalf of customers or other controllers. When providing software, SaaS services, configuration, support, hosting, maintenance, training or access to customer production environments, the Company follows the controller's documented instructions unless otherwise required by European Union or Member State law.

The Policy is binding on Management, the Data Protection Officer, officers, employees, external associates, subcontractors and every third party that, through its duties or contractual relationship with OTS Single-Member S.A., obtains access to personal data or participates in processing operations.

Governance, Roles and Responsibilities

Ultimate responsibility for establishing the personal-data protection framework rests with Management, which approves the Policy, ensures the provision of resources and integrates data protection into the Company's business decisions. The Data Protection Officer has an advisory, oversight and support role in relation to compliance with the GDPR, national legislation and internal requirements, monitors implementation of the framework, provides guidance and acts as the contact point for data subjects and the competent supervisory authority.

Directors and managers of organisational units are responsible for integrating data-protection requirements into the processes they manage, informing the Data Protection Officer of new or changed processing operations, ensuring that access to data is limited to strictly necessary persons and ensuring compliance with approved procedures. Every employee shall handle personal data confidentially, diligently and in accordance with the purpose for which access was granted.

The Information Security Incident Response Team cooperates with the Data Protection Officer in assessing incidents that may constitute a personal-data breach. This cooperation is critical for the timely assessment of the nature, scale and likely consequences of an incident, the corrective action required and compliance with the GDPR notification and communication deadlines.

Processing Principles and Lawful Basis

OTS Single-Member S.A. processes personal data in accordance with the fundamental principles of lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity; confidentiality; and accountability. These principles are binding criteria for the design, performance and control of every processing operation and apply before processing begins, throughout processing and upon its completion or termination.

For each processing operation, the appropriate lawful basis is identified and documented, including performance of a contract, compliance with a legal obligation, protection of vital interests, performance of a task carried out in the public interest, legitimate interests or consent where consent is the appropriate and valid basis. Where processing concerns special categories of personal data or other highly sensitive data, additional conditions, stricter safeguards and specific documentation of necessity and proportionality are applied.

The Company avoids indiscriminate data collection and limits personal data to what is strictly necessary for the specific, explicit and lawful processing purpose. Data is kept accurate and up to date to the extent required by the purpose and is securely erased, anonymised or archived when there is no longer a lawful reason for retention.

Data Subject Rights and Transparency

OTS Single-Member S.A. ensures that data subjects receive clear, intelligible and easily accessible information concerning the identity of the controller, the purposes, lawful bases, categories of data, recipients, retention periods, their rights and any other information required by the GDPR. Privacy notices are kept current and adapted to the type of processing and the intended audience.

The rights to information, access, rectification, erasure, restriction of processing, data portability, objection and not to be subject to a decision based solely on automated processing are supported through an appropriate process for receipt, identity verification, assessment and response. The Company ensures that data-subject requests are examined without undue delay and within GDPR time limits, taking into account whether it acts as controller or processor.

Where OTS Single-Member S.A. acts as processor, it assists the controller in responding to data-subject requests in accordance with the contract and the controller's documented instructions. Where it acts as controller, it responds directly to data subjects and documents the assessment, decision and actions taken.

Data Protection by Design and Privacy Risk Assessment

OTS Single-Member S.A. applies data protection by design and by default so that privacy requirements are integrated into the design of new products, services, applications, internal procedures, workflows, system changes and third-party arrangements. When designing or materially changing processing operations, the Company considers the purpose, necessity, proportionality, categories of data, categories of data subjects, recipients, retention periods, data-subject rights, risks and available technical and organisational measures.

Where processing is likely to result in a high risk to the rights and freedoms of natural persons, a data protection impact assessment is performed before processing begins. The assessment documents the processing, evaluates necessity and proportionality, identifies risks to data subjects and establishes measures that reduce risk to an acceptable level. Where required, the need for prior consultation with the competent supervisory authority is considered.

In alignment with ISO/IEC 27701:2025, privacy-risk management is linked to information-security risk management, assessment of controller and processor roles, documentation of interested-party requirements, selection of controls and monitoring of control effectiveness. Data minimisation, pseudonymisation, anonymisation, encryption, environment segregation, logical data isolation, activity logging and access limitation are considered as preventive and risk-reduction measures.

Records of Processing, Documentation and Contractual Control

OTS Single-Member S.A. maintains and updates records of processing activities for operations in which it acts as controller and for operations in which it acts as processor. The records describe, as applicable, processing purposes, categories of data subjects and personal data, categories of recipients, transfers to third countries or international organisations, retention periods, technical and organisational security measures, the existence of data protection impact assessments and any other information required to demonstrate compliance.

Every arrangement involving personal-data processing is documented through an appropriate contract or other legal act defining the subject matter, duration, nature and purpose of processing, types of personal data, categories of data subjects, and the rights and obligations of the parties. Where the Company engages processors or subprocessors, it evaluates their suitability, imposes contractual confidentiality and security obligations, and ensures that no further engagement occurs without the required prior authorisation.

Where OTS Single-Member S.A. provides services as processor, it ensures that personal data is processed only on documented instructions from the controller, the agreed security measures are applied, the controller is assisted with data-subject requests, impact assessments, personal-data breaches and demonstrations of compliance, and data is erased or returned at the end of service provision in accordance with the contract and legal requirements.

Security of Processing, Access and Personal-Data Breaches

The Company applies appropriate technical and organisational measures to secure processing, taking into account the nature, scope, context and purposes of processing and the likelihood and severity of risks to the rights and freedoms of natural persons. Measures include access controls, identity and rights management, least privilege, encryption where required, secure application development, logical data isolation, activity logging, backups, change control, secure vulnerability management and recovery procedures.

Access rights are granted, modified and revoked according to role, need to know and business necessity. Following a change of duties, employee transfer, termination of employment or end of an engagement, access rights are reviewed and revoked without undue delay. Access to customer environments, test data, production data, support files and documentation is subject to specific control and is logged where technically feasible and necessary.

Every actual or suspected incident that may lead to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data is reported immediately under the incident-management procedure. The Data Protection Officer and the competent incident-response team assess whether the incident constitutes a personal-data breach, whether notification to the supervisory authority is required, whether communication to data subjects is required and which corrective or preventive measures shall be implemented.

Transfers, Recipients and Data Retention

Personal data is transferred or disclosed to third parties only where a lawful basis, contractual authorisation or other legal obligation exists and appropriate confidentiality and security safeguards have been applied. Categories of recipients are documented in records of processing and privacy notices where required.

Personal data is transferred outside the European Economic Area only after assessing the conditions of the GDPR and applying an appropriate transfer mechanism, such as an adequacy decision, standard contractual clauses, binding corporate rules or another lawful basis. Before such transfer, risks, supplementary safeguards and contractual obligations required to protect data subjects are assessed.

Personal-data retention is determined by the processing purpose, legal and contractual obligations, the need to establish, exercise or defend legal claims and the storage-limitation principle. Upon expiry of the retention period, data is securely erased, anonymised or archived in a controlled manner to prevent further unnecessary processing.

Training, Accountability, Control and Continual Improvement

OTS Single-Member S.A. provides information and training to employees who process personal data so that they understand confidentiality, security, lawfulness, minimisation, incident-reporting and data-subject request obligations. Training is adapted to the role, level of access, type of processing and risk level associated with each position or function.

The Company maintains evidence of compliance demonstrating implementation of the Policy, including records of processing, data-subject request records, transfer and disclosure records, processing agreements, risk assessments, impact assessments, training records, incident reports, internal-audit results and management-review decisions. This evidence is retained in a manner that supports accountability and is made available to competent functions or authorities where required.

This Policy is reviewed periodically and additionally whenever legislation, the regulatory framework, ISO/IEC 27701:2025, the organisational structure, services, technologies, information systems, processing roles, risks or interested-party expectations change. Breach of data-protection rules may result in disciplinary, contractual, legal or other consequences, depending on the nature and seriousness of the breach.

Approval and Validity

This Policy shall enter into force following its approval by Management. It applies to all activities falling within its scope and is binding on the Company’s officers, employees and associates to the extent that they participate in the relevant processes.

Management ensures that this Policy is available, understood and capable of being applied, that it is periodically reviewed for its continuing suitability and effectiveness, and that it is updated whenever material changes occur in the business context, applicable requirements, risks, technological conditions or the expectations of interested parties.

For OTS Single-Member S.A.	Position	Date
Spyridon Pampoukidis	Chief Executive Officer	_____22.06.2026____

Consolidated Approval

Upon approval of this revised version, the Policies are incorporated into the controlled documented-information environment of the Integrated Management System of OTS Single-Member S.A. and supersede previous versions in respect of the content they cover, from the date specified by Management.

Management assumes responsibility for providing the resources necessary for their implementation and authorises the competent organisational units to ensure awareness, training, monitoring and documentation of compliance.

Role	Full name	Signature	Date
Chief Executive Officer	Spyridon Pampoukidis		22.06.2026