

	DIAPLOUS MARITIME SERVICES	Procedure IMP-01
	INTEGRATED MANAGEMENT SYSTEM MANUAL COMPANY ORGANOGRAM & POLICIES	Effective Date May 2018

APPENDIX N - ANTI-MONEY LAUNDERING - ANTITRUST - CONFLICT OF INTEREST & TRADE COMPLIANCE

1. ANTI-MONEY LAUNDERING

Money laundering is the process of transforming the proceeds of crime and corruption into ostensibly legitimate assets or when legitimate funds are used to support criminal activities, including terrorism. All companies are at risk of being exploited in this way – and Diaplous must be on guard to help protect its reputation and ensure compliance with the law.

This policy applies to all employees (full and part time) and temporary workers (such as consultants or contractors) (together referred to as “employees” in this document) across the group no matter where they are located or what they do. This policy sets out a single standard that all employees must comply with, regardless of whether local law or practices might permit something to the contrary.

Company’s policy is the zero interaction of any knowingly deal with criminals, suspected criminals or the proceeds of crime. Diaplous and all concerned parties should set due diligence requirements so that Company knows whom is doing business with. Business transactions do not involve acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime. Employees must not hide the origin or nature of criminal property nor facilitate the acquiring, ownership or control of criminal property.

If any of the employees has knowledge or suspicion that a counterparty is involved in money laundering in connection with its transaction with Diaplous, he/she must promptly report it to Diaplous’ Managing Director & further discuss the matter with the management.

2. ANTITRUST

Antitrust laws regulate the conduct and organization of business corporations, generally to promote fair competition for the benefit of consumers. They restrict the mergers and acquisitions of organizations that could substantially lessen competition and prohibit the creation of a monopoly and the abuse of monopoly power.

Supporting these principles is important to Diaplous, not just because it is the law, but because it is Company’s deep belief. Practices such as price-fixing, market sharing, output limitation or bid-rigging, and anticompetitive or monopoly practices must be combated. All concerned parties should be vigilant in not entering into any kind of inappropriate conversation or agreement with Diaplous’ competitors.

Each of Diaplous employees should follow below rules:

- No agreements allowed with competitors, even informally, to fix price or any element of price, such as discounts, surcharges or credit terms.
- No agreements allowed with competitors to reduce or stabilize production, capacity or output.
- No agreements allowed with competitors to divide up customers, accounts or markets.
- Rigging bids or tenders is prohibited.
- Attempts to set a minimum or any resale price for an independent dealer, distributor or reseller are strictly prohibited.
- Sharing or receiving competitively sensitive information without a lawful reason is not allowed.

- Discussions with competitors of any matter on which competitors are not legally permitted to agree is not accepted.
- Employees are encouraged to speak up and report if any potentially anti-competitive practices come to their attention.

3. CONFLICT OF INTEREST

A conflict of interest (COI) is a situation in which a person or organization is involved in multiple interests, financial or otherwise, one of which could possibly corrupt the motivation or decision-making of that individual or organization.

An actual, potential or perceived COI may jeopardize Diaplous' reputation. In that respect, all concerned parties should follow below rules:

- Disclose in writing to your line manager the relevant facts and explain the circumstances that create or could create a conflict of interest
- Avoiding actual, potential or perceived COIs if possible. If you have an actual, potential or perceived COI, you must protect yourself from any suspicion of misconduct by being transparent.
- Everybody can be active in his own time in community, government, educational and other non-profit organizations. However, in any such case, compliance with all relevant laws, regulations and Diaplous policies is mandatory. If there is any doubt, concerns must be reported to Diaplous Managing Director.
- Decisions made in Diaplous should not be influenced by personal considerations such as relationships or outside interests of yourself, family or friends.
- Withdrawing from decision-making that creates an actual, potential or perceived COI, or could be perceived as creating one.

4. TRADE COMPLIANCE

Trade compliance includes export control and reporting, import clearance, anti-bribery, antitrust and competition, third-party agent vetting and management, supply chain security, and overall assessment and management trade regulatory risk.

Diaplous must comply with all applicable national and international trade compliance regulations. Trade compliance includes regulations governing the import, export and domestic trading of goods, technology, software and services as well as international sanctions and restrictive trade practices.

All concerned parties should follow below rules in order to be in compliance with Trade Regulations:

- Obtain, retain and communicate correct customs and export control classification on all goods and software moved internationally. For physical movements of goods and software, valuation and origin information is also required.
- Follow company guidance when travelling with company-owned equipment
- Follow company procedures when utilizing the services of trade / customs agents.
- Follow company procedures when issuing or executing an End User Certificate.

Ensure that third parties have been properly screened against applicable sanctions lists.



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Date:
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Position:
Director

Name:
K. Papaioannou

Signature:

