



## **ANTI-BRIBERY AND CORRUPTION POLICY**

### **COMPANY'S POLICY**

All forms of bribery and corruption are unacceptable and are not be tolerated. Company ensures that any third party acting on our behalf does not, act corruptly in our dealings with any other person.

This policy provides guidance on the standards of behavior to which must all adhere and most of these reflect the common sense and good business practices. This policy is designed to help to identify when something is prohibited so that bribery and corruption is avoided, and provide guidance if there is a problem.

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. It is the responsibility of each of us to ensure that we comply with these standards in our daily working lives. 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.

Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal), and criminal liability for the individual involved (up to and including imprisonment). Employees will be required to confirm that they have read and understood the policy and that they comply with its terms as part of their ongoing employment assessment processes.

All employees must fully comply with below guidelines as well as the relevant anti-bribery laws and international Treaties. In any other case potential non-compliance may undermine Company's performance and jeopardize its high-earned reputation. Such risk could lead to fines for the Company and cause serious harm to our business.

### **WHAT IS BRIBERY**

Bribery involves the following:

1. When a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly) or
2. When a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or
3. Rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly).

It does not matter whether the bribe is:

- Given or received directly or through a third party (such as someone acting on behalf, for example an agent, distributor, supplier, joint venture partner or other intermediary)
- For the benefit of the recipient or some other person



Bribes are regarded as "Anything of Value", and includes not only cash or cash equivalents, but also entertainment, meals, drinks, travel, lodging, gifts, discounts, use of materials, facilities or

equipment, investment opportunities, insurance benefits, political or charitable contributions, promise of future employment and/or any other financial advantage. In determining whether Anything of Value has been provided, the key consideration will be the subjective value of that being conveyed, together with the recipient's perception of it.

Company's mission is to build relationships based on trust and to "Win-Win" concept, maintaining and enhancing both Company's and Client's reputation. Under this frame Diaplous never accept or pay bribes, including facilitation payments. It is also essential that the Company controls that its employees cannot make such deeds on its behalf.

Additionally, it is recommended once a cooperation with a new party is about to commence, the Company should conduct an appropriate due diligence so as to know who you are doing business with, in that way minimizing any risks involved according to IMP 22.

Company can terminate a contractual agreement with subcontractor, partner, supplier, employee in case of bribe issue.

Reporting is a significant chapter which cannot be undermined. Any corruptive behavior must be reported to Diaplous, as by not doing so can result in liability for Diaplous and for individuals. Should any of the employees come to their attention any non-compliant act even a seemingly unsubstantiated claim of bribery and corruption, they must immediately report it even anonymously to the Compliance Manager and/or Managing Director of the Company proceeding further with a disciplinary action if that is required.

Company has assigned the monitoring of anti-bribery policy and procedures to the Compliance Manager. Compliance Manager is an independent function which refers directly to Board Of Directors.

Company monitors the effectiveness of this policy by setting and reviewing anti-bribery objectives.

Company is committed to continuously improve the effectiveness of this policy and relevant procedures.

**All forms of bribery and corruption are prohibited. Company will not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary action being taken and ultimately could result in dismissal.**

**A bribe does not actually have to take place - just promising to give a bribe or agreeing to receive one is prohibited.**

**Bribery is prohibited when dealing with any person whether they are in the public or private sector and the provisions of this policy are of general application**