

InTTrust S.A.

**Anti-Bribery &
Corruption Policy**

Anti-Bribery & Corruption 2020 Edition

Introduction

InTTrust S.A. values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of InTTrust's staff as well as others acting on InTTrust's behalf are key to maintaining these standards.

The purpose of this document is to set out InTTrust's policy in relation to bribery and corruption. The policy applies strictly to all employees, partners, agents, consultants, contractors and to any other people or bodies associated with InTTrust S.A. within all offices, areas and functions.

Understand and recognize bribery and corruption

Acts of bribery or corruption are designed to influence individuals in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest under the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing that person to act or to reward them for having acted in a way which a reasonable person would consider improper under the circumstances.

Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision. **Consideration is given also to the following points:**

- How do other Greek or international companies in the same area operate? Can they recommend particular individuals or groups to work with?

- The relationship with the local or national government. Are there direct lines of communication with trustworthy officials, and do operations comply with InTTrust's anti-corruption and anti-bribery policies?
- The frequent evaluation of the success employee training and awareness about InTTrust's anti-bribery and anti-corruption policy in our business environment.

Penalties

The Bribery Act 2010 came into force on 1st July 2011. Under that Act, bribery by individuals is punishable by up to 10 years imprisonment and/ or an unlimited fine. If InTTrust S.A. is found to have taken part in bribery or is found to lack adequate procedures to prevent bribery, could face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for InTTrust S.A..

The Policy

InTTrust S.A. will not tolerate bribery or corruption in any form.

InTTrust S.A. prohibits the offering, giving, solicitation or acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- To or from any person or company wherever located, whether a public official or public body, or a private person or company
- By any individual employee, partner, agent, consultant, contractor or other person or body acting on InTTrust's behalf
- In order to gain any commercial, contractual or regulatory advantage for the practice in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- Normal hospitality
- Fast tracking a process which is available to all on the payment of a fee; and/or
- Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to Mr Kostas Sfetsos who is the InTTrust's Compliance Consultant.

InTTrust S.A. will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Key risk areas

Bribery can be a risk in some areas of InTTrust's business. Below are the key areas we are aware of in particular:

- Excessive gifts, entertainment and hospitality can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they are within reasonable limits and are authorized by a partner. Any gift or hospitality, either given or received, exceeding the ethic limits of this policy should be reported to the Compliance Consultant.
- Facilitation payments are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The practice will not tolerate or excuse such payments being made.
- Reciprocal agreements or any other form of '*quid pro quo*' are never acceptable unless they are legitimate business

arrangements which are properly documented and approved by a partner. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

- Actions by third parties for which the practice may be held responsible can include actions by a range of people, e.g. agents, contractors and consultants, acting on the practice's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorized and recorded.
- Misleading or incomplete record keeping can be exploited to conceal bribes or corrupt practices. Intrust has robust controls in place so that our records are accurate and transparent.

Employees' responsibility

The prevention, the detection and the reporting of bribery or corruption are the responsibility of all partners and employees of the company. In any case of suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then employees have the duty to report this to the Compliance Consultant without delay.

