

# **DPG DIGITAL MEDIA**

## **Anti-Bribery and Anti-Corruption Policy**

### **1. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT**

**1.1** DPG DIGITAL MEDIA is committed to conducting business in accordance with the highest ethical and legal standards. The integrity of our staff, and those with whom we do business, is critical to our success.

This Anti-Bribery and Anti-Corruption Policy is drafted with these obligations in mind, in order to state DPG DIGITAL MEDIA's position on bribery and corruption and to provide information and guidance on recognizing and dealing with these matters.

**1.2** DPG DIGITAL MEDIA applies a zero-tolerance policy to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates. In order to do so, DPG DIGITAL MEDIA is committed to implementing and enforcing effective systems to counter bribery in accordance with all applicable laws of Greece (such as Transposition Laws 2656/1998, 2802/2000, 2803/2000, 2957/2001, 3560/2007 and 3666/2008 as modified by Law 4254/2014, of EU and UN Conventions and Regulations), the US Foreign Corrupt Practices Act of 1977 as amended, and the laws of the various jurisdictions where the firm's services are rendered, to the extent that such laws are applicable.

**1.3** DPG DIGITAL MEDIA does not tolerate any form of bribery or corruption. DPG DIGITAL MEDIA will never provide, offer, or offer to provide, or authorize or solicit anyone to provide, directly or indirectly, benefits of any nature to any individual, in order for such individual to proceed, in violation of their duties, to an act or omission. DPG DIGITAL MEDIA will never demand or accept, directly or indirectly, benefits of any nature or the promise thereof, in order to induce or reward improper performance in the form of an act or omission which arises from or conflicts with a person's duties.

**1.4** In this Policy, “third party” means any individual or organization staff which, during the course of its work for the firm, comes into contact with DPG DIGITAL MEDIA and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## **2. WHO IS COVERED BY THE POLICY**

**2.1** The fundamental standards of integrity under which DPG DIGITAL MEDIA operates do not vary depending on where we work or who we are dealing with.

**2.2** This Policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, committee and board members, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual staff and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “staff” in this Policy).

**2.3** This policy sets out a single standard that all staff must comply with, regardless of whether local law, customs or practices might permit otherwise.

**2.4** Failure to comply with this policy, whether or not it is intentional, may lead to disciplinary action which could result in dismissal for gross misconduct as well as criminal liability for the individual involved, according to relevant Greek Laws.

**2.5** Staff will be required to confirm that they have read and understood the policy and that they comply with the terms.

**2.6** This policy does not directly form part of any staff’s contract of employment and it may be amended at any time.

### **3. WHAT IS BRIBERY**

Bribery involves the following:

- When a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them to perform their responsibilities or duties improperly, or
- When a financial or other advantage is requested, agreed to be received or accepted by another person to perform their responsibilities or duties inappropriately.

It does not matter whether the bribe is:

- Given or received directly or through a third party, or
- For the benefit of the recipient or some other person.

### **4. GIFTS AND HOSPITALITY**

**4.1** DPG DIGITAL MEDIA acknowledges that in many jurisdictions gift giving is a customary way of building a more personal relationship or showing gratitude for a service rendered. However, in accordance with the present policy, DPG DIGITAL MEDIA is extremely careful with regards to giving and receiving gifts.

**4.2** Whereas customary gifts are usually acceptable, gifts that could be perceived as extravagant, lavish or otherwise inappropriate shall not be offered or received. The intention behind the gift should always be considered. Cash or other equivalent instruments are never acceptable as gifts.

### **5. ANTI-MONEY LAUNDERING**

DPG DIGITAL MEDIA actively complies with anti-money laundering and anti-terrorism Laws and Regulations and acknowledges that it has a duty to report to the competent Greek authorities any behavior that may be deemed suspect.

## **6. FACILITATION PAYMENTS**

6.1 Facilitation payments are any payments, no matter how small, given to an official to increase the speed at which they do their job.

6.2 All facilitation payments are generally prohibited. However, in exceptional circumstances when payment is clearly unavoidable, such payments shall be made after consulting the firm and reporting to the authorities.

## **7. DONATIONS**

DPG DIGITAL MEDIA does not contribute to any political party. No charitable donations shall be made for the purpose of gaining any commercial advantage.

## **8. DEALING WITH PUBLIC OFFICIALS**

8.1 Although this policy applies to both public and private sectors, dealing with public officials poses a particularly high risk in relation to bribery and corruption due to the strict rules and regulations in our country.

8.2 Public officials include those in government departments, but also employees of government owned or controlled commercial enterprises, international organizations, political parties and political candidates.

8.3 The provision of money or anything else of value, no matter how small, to any public official for the purpose of influencing them in their capacity is prohibited.

## **9. RECORD KEEPING**

DPG DIGITAL MEDIA keeps financial records and has appropriate internal controls in place, which will evidence the business reason for making any payments to third parties. All accounts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and

completeness. No accounts must be kept off-book to facilitate or conceal improper payments.

## **10. RAISING CONCERNS**

Staff will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, corruption, money laundering, improper donations or facilitation payments.

## **11. MONITORING AND REVIEW**

**11.1** The effectiveness of the implementation of this Policy will be reviewed and monitored regularly considering its suitability and adequacy. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

**11.2** All staff is responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

**11.3** Staff is invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions-and queries should be addressed to your legal department.