



## ANTICORRUPTION POLICY

Relational is a globally operating organization. Our employees are in contact with numerous public and private organizations, NGOs, commercial companies and other counterparts all over the world. Relational actively supports the international fight against corruption.

In Relational, we are determined to maintain the highest standards of integrity and work ethics among our staff and across all areas of activity. We therefore maintain a policy of zero tolerance towards corruption in all its forms.

This Anti-Corruption Policy and its Code of Conduct are applicable to all staff working in Relational. Its purpose is to ensure and support behavior and work ethics characterized by the highest standards of personal and organizational integrity, both internally and externally with our customers, suppliers and business partners.

This Anti-Corruption Policy provides guidance to staff on their required conduct when confronted with corruption, corrupt practices or corrupt propositions, and when working to prevent corruption.

All staff of Relational in Greece and abroad will respect and promote the principles of the Code of Conduct presented below:

### **1. Conflict of interest**

**We will avoid any conflict – real or potential – between our personal interests and the interests of Relational.**

Conflicts of interest arise from situations in which a member of staff has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of his or her duties. Private interests include any advantage to oneself or one's family, close relatives, friends and persons or organizations with which one has or has had business or other relations. When faced with a potential or actual conflict of interest, staff is required to promptly inform their superiors.

### **2. Bribery**

**We will not give or accept bribery in any form.**

Bribery is the act of offering, giving (active bribery), receiving, soliciting or accepting (passive bribery) something of value with the purpose of influencing the action of a person in the performance of his or her duties. Bribery is a criminal offence in Greece.

### **3. Extortion**

**We will not for private purposes seek to influence any person or body by using our position or by using force or threats.**

Extortion occurs when a person unlawfully demands or receives money or property through intimidation. Extortion may include threats of harm to a person or his/her property, threats to accuse him/her of a crime/illegal act, or threats to reveal embarrassing information. Some forms of threat are occasionally singled out for separate statutory treatment under the designation "blackmail." Extortion is a criminal offence in Greece.



#### **4. Fraud**

**We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.**

Fraud is the use of deception with the intention of obtaining an advantage (financial or otherwise), avoiding an obligation or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behavior, practicing trickery or acting under false pretences. Fraud is a criminal offence in Greece.

#### **5. Embezzlement**

**We will not misappropriate or otherwise divert property or funds entrusted to us.**

Embezzlement is the misappropriation or other diversion of property or funds legally entrusted to someone by virtue of his or her position. Embezzlement is a criminal offence in Greece.

#### **6. Gifts**

**We will not give, solicit or receive directly or indirectly any gift or other favour that may be seen to influence the exercise of our function, performance of duty or judgment. This does not include conventional hospitality or minor gifts.**

In the context of corruption, a gift is a financial or other benefit, offered, given, solicited or received in the expectation of receiving a benefit in return. Gifts and hospitality may be in themselves a manifestation of corrupt behavior. They may be used to facilitate corruption, or may give the appearance of corruption. Gifts may include cash or assets given as presents, and political or charitable donations. Hospitality may include meals, hotels, flights, entertainment or sporting events.

As a general rule, staff should not receive gifts or other advantages.

#### **7. Nepotism and favouritism**

**We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, consular services or other situations.**

Nepotism is favouritism shown to relatives or friends without regard to merit. In such a context relatives or friends tend to be treated favourably based on the close personal relationship alone rather than on a professional and objective assessment of their skills and qualifications.

#### **8. Reporting corruption cases**

**We will report any evidence or suspicion of breach of this Code of Conduct.**

All staff are obliged to familiarize themselves with the Code of Conduct and respect its principles. They are obliged to report any evidence or suspicion of breach of the Code to their superiors.