



Comergon Anti - Bribery/Corruption/Money Laundering Policy

Comergon is committed to compliance with anti-bribery & anti-corruption laws in all countries where Comergon operates. Beyond such applicable Laws in our headquarter's domicile (Greece), these laws also include the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and laws enacted in accordance with the OECD Convention.

Aforementioned legislation prohibits, in similar wordings, all improper payments, such as bribes and kickbacks, as well as offers or promises to make improper payments, whether or not the offer or promise is successful. Bribes and kickbacks (including offers or promises to make improper payments) are illegal and against Comergon policy, whether the conduct is engaged in by Comergon colleagues or by any third party acting on Comergon's behalf. Improper payments can involve promises or payments in cash but also alternatively in gifts, travel expenses, future business, business meals & sponsorships. Other forms also include hospitality & entertainment expenses as well as offers of employment. Improper payments include both inducements (pre-transaction) and rewards (post-transaction).

A clear distinction exists between active and passive bribery acts. By 'active' one would be the 'donor', by 'passive' one would be the 'recipient'. Both such types of actions are included under this policy.

At Comergon, we actively refrain from any appearance of impropriety. All third parties acting on Comergon's behalf in connection with Comergon obtaining or retaining business must be informed about this policy and must abide to its principles, verbally or in writing if necessary. All Comergon colleagues must consult higher management before entering into any arrangement with a third party to assist Comergon in obtaining or retaining business.

We do not make, or receive, improper payments, including bribes or kickbacks, to/from anyone, whether or not the donor/recipient is considered a government official or is employed by a private (non-governmental) commercial entity. Comergon's prohibition on bribery applies to all improper payments regardless of size or purpose, including "facilitating" (or expediting) payments.



Facilitating payments refer to small payments to government officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or business permit, processing government papers etc. Particular vigilance must be exhibited in cases where government officials are involved. The term 'government' is used in this policy not in a *stricto sensu* manner and if you are unsure whether someone should be considered a government official, please consult higher management, the compliance officer and/or the legal counsel.

All Comergon colleagues must record all expenses accurately and such should be recorded in our books and records and supported by accurate documentation and invoices that clearly reflect the economic realities of all transactions.

No directors, partners, lawyers and employees of Comergon hold an elected position in any government department, state-owned enterprise, international institution or government agency including the armed forces and police or have decision making authority or official influence over any of the above institutions. Furthermore, none of the above-mentioned persons receives an official payment for any reason from a governmental source or is an official of a political party or is convicted of a criminal or regulatory offence related with anti-bribery and anti-corruption laws. If any Comergon colleague, director, partner or consultant is inclined to assume a position in contrary to the above, prior communication with higher management is absolutely necessary.

We actively comply with anti-money laundering and anti-terrorism laws and regulations, and we acknowledge that we have a duty to report to the competent Greek authorities any behavior that may be deemed "suspect".

To this end, we do not accept cash payments larger than €500, and all payments are to be made by bank transfer or credit card as provided by law. We keep accurate books and records and we prohibit any kind of falsification thereof. All of our books and accounting records may provide requisite information with supporting documentation for audits and investigations by the authorities in the event of a bribery incident. In order to prevent the possibility of bribes and kickbacks being paid or accepted, all of our books and records must fairly and accurately reflect



each transaction involving our business with our clients, employees, other staff and any other third party.

Secret, unrecorded, or unreported transactions are prohibited. Any and all transactions of our Organization are authorized by appropriate management in accordance with internal control procedures.

We will not assist our clients to conclude transactions which could be considered contrary to the provisions of the law. We will refuse to provide services when we know or reasonably suspect that we are being asked to provide such in order to enable or facilitate the commission of any act which is illegal, related to money-laundering, terrorism, corruption, fraud, or other financial crimes.

In accordance with applicable EU and Greek legislation we have adopted and apply internal procedures so as to be compliant with all KYC & AML obligations applicable to our Organisation. In this respect, we always ensure that we are fully aware of our clients' engagements terms, security guidelines and compliance standards.

Improper payments, holding elected positions in sensitive organizations and money laundering actions violate Comergon's policy. Such actions subject both Comergon and the individual involved to potential civil and criminal penalties and can significantly damage Comergon's reputation. Every employee of Comergon is required to acknowledge receipt and acceptance of this Policy in writing.

Employees should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law and policy herein, by referring to Comergon's compliance officer and/or legal counsel.

Comergon SA | Risk Managers | Insurance Brokers

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