



**attica**  
THE DEPARTMENT STORE

# **POLICY AGAINST BRIBERY**

**Approved by the Board of Directors of the Company on 11/10/2024**



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## 1. Definitions

For the purposes of this Policy, the following definitions apply:

**Company:** means the company "ATTICA DEPARTMENT STORES SINGLE MEMBER SOCIETE ANONYME"

**Policy:** means the Anti-Bribery Policy.

**Bribery:** consists of demanding, receiving, offering, promising or giving money or other undue and unfair benefit from or to an employee of the Company or a Public Officer in order to secure a commercial or personal advantage.

## 2. Purpose

The Company is committed to preventing, deterring and detecting fraud, bribery and all unlawful practices. It is the Company's policy to conduct all its business with honesty, integrity and the highest possible ethical standards and to vigorously enforce its business practices wherever it operates geographically and not to engage in situations of bribery and corruption.

The Company's key objectives for the prevention of bribery are the following:

- Constant compliance with all legal and regulatory requirements related to anti-bribery.
- Universal prohibition of bribery by all employees and cooperating parties.
- Zero tolerance for bribery and corrupt activities.
- Establishment of anti-bribery targets and appropriate mechanisms to review and achieve them.
- Encouraging employees to report incidents in good faith, with reasonable suspicion and without fear of retaliation.
- Ensuring that the complaint handling mechanism is confidential.
- Continuous training of staff to achieve the objectives.
- Ongoing information and encouragement of suppliers and partners to raise awareness against bribery.



- Assessment of the risk related to anti-bribery issues that may arise during the performance of its activities.
- Ongoing training for staff and other stakeholders to achieve the required anti-bribery sensitivity.

The Policy and any amendments thereto are approved by the Board of Directors of the Company. Employees and stakeholders are responsible for its implementation.

The Company is committed to ensuring the highest level of ethical and professional conduct and zero tolerance for illegal or anti-governance actions that could damage its reputation and credibility.

### 3. Scope of application

This Anti-Bribery Policy specifies and elaborates the principles contained in the Company's "Code of Conduct and Ethics". It applies to the Management Team, Employees and the Company's counterparties (interested parties). The personal commitment of all executives and senior managers of the Company (Management Team) to promote an anti-bribery culture (commitment from the top) has a strategic role in fostering a culture of legitimacy at all levels. It clearly and categorically states the rejection of any practice of bribery and corruption and the absolute commitment of the Company's executives to the principles of ethics and integrity. Company employees, regardless of their function, position, role or duties, must be consciously aware that long-term business success can only be achieved if compliance is an integral part of all corporate activities and business transactions.

This Policy also governs the establishment of relations with any Counterparty who intends to enter into a business relationship with the Company, as well as the continuation of its business activities with the Company. All persons listed above must be aware of and comply with this "Anti-Bribery Policy" and the regulations in force in the exercise of their duties to ensure that the Company is not exposed to the risk of sanctions and serious damage to its good reputation.

For each Employee of the Company, any violation of this Policy constitutes a breach of the



terms of his/her employment contract, which may result in disciplinary action and which gives the Company the right to terminate the employment contract and/or to consider any other action for its protection before the competent authorities.

#### 4. Context of the Policy

Offering or receiving any form of improper payment, improper advantage or bribe has no place in the Company. Bribery is expressly prohibited by Greek law and specifically by the Greek Criminal Code. Both the above and other legislation and European and international texts, such as the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery, impose serious sanctions on companies and individuals who violate them, including heavy fines and, in the case of individuals, imprisonment.

#### 5. Transactions with Government Officials and Public Officer

The provision, offer or promise of any benefit to Government Officials and Public Officers, directly or indirectly, is expressly prohibited. This Policy also prohibits "facilitation payments", payments of small value, as well as gifts to the aforementioned persons for the purpose of inducing them to perform improper acts in the course of their duties.

"Government Officials" shall mean the following:

- Officials, employees or representatives of any government, department, agency, office, authority, body or public international organisation. A public international organisation is an organisation set up by states, governments or other regional or supranational bodies. Such organisations include, for example, the UN, the Organisation of American States (OAS) and the International Red Cross.
- Persons acting on behalf of the government,
- Officials or entities owned or controlled by the government; and
- Candidates for political office



## 6. Transactions with private entities and natural persons (non-governmental officials)

Even in transactions that do not involve Government Officials, due care and diligence is required to ensure that the staff and by extension the Company act with absolute integrity.

Under no circumstances should any benefits, advantages or any item of value be offered to any person who is not permitted to receive it, or with any intention of improperly influencing any business decision.

Prior notification of the executive specifically charged with managing matters related to this Policy, as defined below, and prior written approval of his or her competent supervisor is required before providing or offering anything that we believe may improperly influence a business decision, improperly influence a decision maker, or cause recipients to breach any duties against their employers.

## 7. Corporate hospitality and gifts

This Policy clarifies what is acceptable and unacceptable in relation to gifts, hospitality or entertainment, sets out factors to consider, a procedure for recording gifts, hospitality or entertainment and a procedure for evaluating the above.

This Policy applies both to gifts and hospitality/entertainment that we offer and to gifts and hospitality/entertainment that we receive. In order to assess a gift or an act of hospitality/entertainment as reasonable, the criterion is the perception of the average honest entrepreneur in the industry that they are business gifts or benefits, the value of which can be justified on grounds of decency or business ethics.

Specifically, the criteria that must be applied in order to evaluate the offer or receipt of a gift are:

- Critical to assessing a gift or an act of hospitality/entertainment as reasonable is the perception of the average honest entrepreneur in the industry as to whether the benefit is consistent with normal business practice and the benefit is proportionate to the circumstances.
- Gifts or hospitality/entertainment should be of such a nature, taking into account the specific occasion, that they can be successfully controlled without damaging the Company's business image, reputation and goodwill.
- Gifts and hospitality/entertainment should not be repeated between the same persons.



- Gifts and hospitality/entertainment must be carried out transparently and must not involve or imply the assumption of any obligation.
- Gifts or hospitality/entertainment benefits of nominal (net) value up to three hundred (300.00) euros or equivalent in any currency are considered acceptable, but must be recorded and reported in accordance with the Company's procedures.
- In the context of the offer of gifts or hospitality, the Company complies with any notified prohibition of such gifts or hospitality by the recipient's corporate policy or the legal framework governing his/her company or applicable in his/her country of residence.
- The person receiving or providing the gift must, with due diligence, promptly notify the CEO of the Company of this fact, in order to update the gift register provided for herein.

If gifts or hospitality/entertainment are offered that violate the above guidelines and are not permitted by this Policy, the person to whom the offer is made will politely decline and explain the Company's rules. If in view of the specific circumstances it is difficult and/or offensive to reject or return the gift, the person to whom the offer is made must inform the CEO of the Company and receive instructions on the appropriate action to be taken.

If the CEO receives a gift (net) value of more than three hundred (300.00) euros and considers that he/she should keep it in order not to be considered offensive, he/she should inform the Regulatory Compliance Officer.

### **Gift evaluation procedures**

The control of gifts or hospitality benefits provided by the Company and their recipients is the responsibility of the Compliance Unit and is controlled by the Regulatory Compliance Officer. The purpose of this control is to ensure that an employee, officer or member of the Company's Management did not receive from or offer to professionals (natural or legal persons), business gifts, the value of which is not justified by reasons of propriety or business ethics. The control is included in the permanent control plan, or it is carried out as a preventive measure, or at the request of the recipient of the benefit or gift, as mentioned above. The CEO may recommend to the Board of Directors to adjust the value criterion for gifts and/or this policy, but this can never be done retroactively.

### **Register of gifts**

Gifts or hospitality/entertainment benefits that we offer or are offered to us are recorded in a special register kept by the CEO, which also records the details of the offeror and the recipient, the time of the offer, the estimated value of the gift or hospitality/entertainment benefit and any repeatability of similar benefits between the same persons within the last



year.

## 8. What is not acceptable

It is not acceptable for any employee of the Company (or on behalf of the Company) to:

- Accept a gift offer of any size from any third party who is in negotiations with the Company or submits a proposal for cooperation with the Company.
- Give, promise to give or offer any payment, gift, hospitality or advantage with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given.
- Give, promise to give or offer any payment, gift or hospitality to a government official, public officer, agent or representative to "facilitate" or expedite a routine procedure.
- Accept or solicit any payment, benefit, gift or hospitality from a Third Party that it knows or suspects is being offered with the expectation that it will provide it with a business advantage.
- Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this Policy.
- Engage in any activity that could lead to a breach of this Policy.

The points mentioned above are indicative and are in no way intended to limit the scope of this policy.

## 9. Awareness and responsibility

The entire staff of the Company is responsible for ensuring compliance with this Policy. Supervisors should ensure that their subordinates receive the guidance and training they need to work in accordance with this Policy and applicable laws.

If an employee willfully ignores or turns a blind eye to any evidence of corruption or bribery within and/or around his/her department, action will also be taken against the employee. Although such conduct may be "passive", i.e. the employee may not have directly participated in or benefited directly from the corruption or bribery in question, his/her deliberate disregard may, depending on the circumstances, carry the same disciplinary penalty as an intentional act.

The Company ensures that educational activities are carried out in order to ensure a better understanding of the content of the Policy and to raise awareness of bribery issues among all employees.





## 10. Conflicts of interest

Conflicts of interest arise when an individual's interest interferes or appears to interfere with the interests of the Company. A conflict of interest may develop into a bribery problem when an employee requests, agrees to receive or receives an item of value, which interferes with the employee's judgment in performing his/her role on behalf of the Company.

Examples of instances where a conflict of interest may arise include personal interest in a contract, employment outside the Company, use of the Company's confidential information in a personal transaction, or the pursuit or acceptance of gifts or entertainment beyond the above defined permissible limit.

As a result, it is not permitted to engage in activities that involve, or could involve, any conflict of interest.

## 11. Record keeping

All records deemed necessary for the proper implementation of this Policy shall be kept as set out in Annex I to this Policy.

## 12. Breaches and sanctions

The Company demonstrates zero tolerance to any behaviour that does not comply with this Policy and any breach of this Policy is considered as a very significant event, which constitutes disciplinary misconduct that will result in penalties, in accordance with the Company's Labour Regulation.

Disciplinary action shall be decided on a case-by-case basis, depending on the nature and seriousness of the conduct or deliberate failure to act and the infringement found, in accordance with the principle of proportionality. All cases shall be administered in a consistent manner on the basis of the principle of equality. Any disciplinary action shall be imposed without prejudice to the provisions of applicable law.

## 13. Submission of reports and complaints

The procedure for filing, managing and investigating any report/complaint, including the cases described in this Policy, as well as the principles governing data analysis, record keeping, protection of personal data and protection against retaliation in a report/complaint are detailed in the Company's



"Whistleblowing Policy".

## 14. Monitoring and control

The Company has designated the Regulatory Compliance Unit responsible for the management of issues related to this Policy (email: [compliance@idealholdings.gr](mailto:compliance@idealholdings.gr) )

The main responsibilities of the above-mentioned executive will be:

- Contact person for staff regarding issues that arise and clarifications needed with respect to the implementation of this Policy.
- Ensuring that staff training on issues related to the Anti-Bribery Management System is conducted on an annual basis
- Completion of the Position Description, on issues related to the Anti-Bribery Management System in cooperation with the Head of the Human Resources Division,
- Participation in the selection of training staff, training programmes and trainees on Anti-Bribery Management System issues
- Ensuring the operation of a complaint management system in the Company
- Participate in the investigation of any reported cases of bribery
- Overseeing the implementation of all legal and regulatory requirements related to the fight against bribery.
- Direct access to the Board of Directors.

## 15. Approval and revision of the Policy

The "Anti-Bribery Policy" is approved by the Company's Board of Directors, and is communicated to Employees, stakeholders and third parties by posting it on the Company's website.

The "Anti-Bribery Policy" is reviewed annually and revised by the Company in response to any modifications of applicable law or of our practices and generally whenever the need arises. In such cases, the most recent Policy will be posted each time.

## ANNEX I

	<b>Type</b>	<i>"Estimate" or "Receipt"</i>	
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<b>Gift/Hospitality benefit details</b>	<b>Description</b>	<i>Brief description of the gift or hospitality benefit being entered</i>	
	<b>Reason / Cause</b>	<i>A summary of the reason or occasion for which the gift or hospitality benefit is given</i>	
	<b>Date</b>	<i>Date on which it was offered or received</i>	
	<b>Value</b>	<i>Indicate the estimated value of the gift and if unknown explain further under "Reason for the gift"</i>	
	<b>Address</b>	<i>Number and street where the gift or hospitality benefit was delivered</i>	
	<b>Actions after receiving the gift</b>	<i>For gifts received, please indicate what happened to them after you received them</i>	
<b>Gift giver information</b>	<b>Name / Company name</b>	<i>Indicate the name/company name of the gift giver or hosting provider</i>	
	<b>Gift giver address</b>	<i>Address of the gift giver or if it is the company leave it blank</i>	
	<b>Full name</b>	<i>Full name of gift giver if not previously provided /otherwise leave it blank</i>	
	<b>E-mail address / Phone of gift giver</b>	<i>Provide the email or phone number of the gift giver</i>	
	<b>Relationship to the Company</b>	<i>Identify the relationship of the gift giver to the Company (e.g. supplier, partner, etc.); if the Company is the gift giver, leave it blank</i>	



<b>Information of gift recipient</b>	<b>Name / Company name of gift recipient</b>	<i>Name of the person or company receiving the gift/hospitality benefit - if multiple, use separate line for each</i>	
	<b>Address of the recipient of the gift recipient</b>	<i>Address of the gift recipient, if it is the Company or someone from the Company leave it blank</i>	
	<b>Full name</b>	<i>Full name of gift recipient if not previously specified, otherwise leave it blank</i>	
	<b>E-mail address / Phone of gift recipient</b>	<i>Provide the email address or phone number of the gift recipient</i>	
	<b>Relationship to the Company</b>	<i>Identify the relationship of the gift recipient to the Company (e.g. supplier, partner, etc.); if the Company is the gift giver, leave blank</i>	