

Policy on the Prevention of Bribery

Dear Colleagues and Partners,

The Bodossaki Foundation acknowledges that bribery and corruption pose a significant threat to society. We have a responsibility to those who place their trust in us, to those who benefit from our work, and to society as a whole, to uphold the highest standards of integrity in all our activities and to clearly communicate our expectations for minimising the risk of bribery.

Our policy is one of 'zero tolerance' towards bribery. Accordingly, we are committed to operating in full compliance with the relevant laws in force at any given time, as well as with the requirements of the Bribery Prevention Management System, in line with the ISO 37001 standard.

It is essential that you understand and adhere to the principles outlined in this Policy, which details our requirements in the fight against bribery and corruption, in order to:

- ensure that the management of the Foundation's resources – both internal and external – is efficient, ethical, and transparent.
- safeguard our reputation.
- act in accordance with our values and culture.
- comply with the requirements of the applicable laws and the Foundation's Bribery Prevention System, in accordance with the specialised standard ISO 37001.

You may seek guidance at any time from the individuals responsible for the departments to which you belong, the Foundation's Legal Department, the Responsible Officer for the Receipt & Monitoring of Reports (ROMR), or the President of the Board of Trustees of the Foundation, depending on the situation. Any individual who violates the provisions of this Policy and/or the laws pertaining to bribery and corruption will be subject to appropriate disciplinary action and/or criminal prosecution.

Additionally, you have a responsibility to report any actions or incidents that you reasonably believe to be in violation of this Policy.

Kind regards,



To whom does the Policy apply?

The requirements of this Policy on the Prevention of Bribery (hereinafter referred to as the 'Policy') of the Bodossaki Foundation (hereinafter the 'Foundation'), which forms part of the Foundation's Code of Professional Conduct, apply to individuals involved in the Foundation's Board of Trustees and Committees, to all employees of the Foundation (regardless of position or length of employment), to those who cooperate with the Foundation in any capacity (e.g., through supply contracts for goods or services, contractors, etc.), to individuals receiving financial support or awards for their academic, cultural, and social contributions (e.g., donations, grants, awards, distinctions, etc.), and to any other person (whether legal or natural) connected to the Foundation.

The Foundation requires all external entities with which it collaborates, particularly suppliers and other civil society organisations, to ensure that all their staff—especially those who interact with the Foundation—adhere to the provisions of this Policy.

What is Bribery?

Bribery is the offer, promise, provision, acceptance, or solicitation of an undue advantage of any form or value (financial or non-financial), whether directly or indirectly, as an inducement or reward to a person to refrain from carrying out their duties as required by law, relevant contractual obligations, good faith, or proper business conduct.

Passive Bribery (bribery acceptance) involves the request (explicit or implicit) or acceptance of an undue benefit of any nature as an inducement or reward for refraining from carrying out one's duties as required by law, applicable contractual obligations, good faith, or proper business conduct.

Bribery may take any form, such as payments in money or in kind, fictitious work or 'consulting' relationships, political contributions, sponsorships, gifts, travel, hospitality, or reimbursement of expenses. It does not matter whether:

- the bribery is given directly or through a third party, or
- it is given for the benefit of the recipient or another individual.

Bribery may be financial or non-financial, and it can include the provision or acceptance of money, loans, contributions, or donations, travel, employment



offers, kickbacks, discounts, goods, services, or anything else that may be deemed valuable.

Gifts or entertainment may be considered forms of bribery under certain circumstances.

There should be no engagement in any matter where bribery is involved.

For this reason, the acceptance, offering, or promise of any item of value, financial or otherwise, to or from any individual that could influence the Foundation's activities is unacceptable.

Special attention should be given when communicating, cooperating, transacting, or interacting with public officials or individuals holding public office, or political figures, as well as their relatives, associates, and partners.

Gifts

The provision of gifts (in any form), directly or indirectly, to a person in exchange for any benefit, influence on behaviour or decision-making, preferential treatment, or exercise of influence in favour of the Foundation is prohibited.

Symbolic gifts may be provided by the Foundation in the form of ceremonial or commemorative gifts and only when given on an occasional basis and in appropriate circumstances.

Receiving or requesting gifts of any nature or value from suppliers is strictly prohibited. Discounts granted to the Foundation regarding the value of goods or services provided by suppliers as part of fair and lawful market competition are not considered gifts.

Receiving or requesting gifts of any kind or value from recipients of any form of financial support or awards from the Foundation is likewise strictly prohibited.

The acceptance of small, symbolic gifts is not prohibited, provided that such acceptance does not invite negative criticism, falls within the boundaries of reasonable and socially or professionally acceptable courtesy, and is both lawful and properly documented.



Gifts beyond those classified as symbolic/ceremonial must be declared by the individuals receiving them to the head of the department they belong to.

In case of an attempt to offer gifts (except ceremonial ones) or in cases where there is doubt about accepting a gift from a funded individual or supplier or partner, we must seek the assistance of the head of our department, who will submit the offer for approval or rejection by the President of the Foundation.

Meals, Hospitality, Travel, and Entertainment

Meals and entertainment provided by suppliers, partners, grant recipients, etc., are permitted only if they do not invite negative criticism of the recipient, serve a legitimate business purpose, and fall within the bounds of reasonable and socially or professionally accepted courtesy.

It is important to always consider whether the offered meal or entertainment might be seen as excessive or inappropriate, or if it could imply or suggest an obligation on the part of the recipient.

Under no circumstances is it permissible to request meals or entertainment activities.

The Foundation may provide meals and hospitality to third parties only on an occasional basis and under appropriate circumstances.

In all cases, their value should be reasonable and serve legitimate purposes only.

Receipts for meals and hospitality must comply with the Foundation's operational expenditure management rules.

The Foundation does not pay or reimburse travel expenses under any circumstances if the provision could be construed as bribery.

Donations, Grants, and Awards

As a charitable organisation, the Foundation provides donations, grants, and awards, including monetary prizes, in line with its four strategic pillars: the promotion of education, the improvement of healthcare, the protection of the environment, and the empowerment of civil society.

No person may be supported or given an award if:



- there are indications that the individual does not demonstrate financial transparency.
- the support or award could be misdirected to an inappropriate recipient and linked to an undue benefit.

The Foundation may accept donations, grants, bequests, and legacies from third parties in accordance with its organisational regulations (see Official Gazette B' 5206, 07-10-2022, Presidential Decree 29-09-2022) and the relevant legislation governing its operation. In each such case, and before acceptance, the Foundation conducts due diligence to assess the risk of bribery. In any case, donations, grants, bequests, and legacies that pose a bribery risk are not accepted.

Political Donations – Donations to Judicial and Prosecutorial Officers, Members of Independent Authorities, and Public Officials

Donations to political parties, officials of political parties, candidates for political office at any level, judicial and prosecutorial officers, members of independent authorities, and public employees and officials in general are prohibited.

Collaboration with Third Parties

The Foundation may be held accountable for bribery committed by individuals acting on its behalf, particularly for bribery carried out by employees or other individuals providing services to the Foundation or collaborating with it.

It is strictly prohibited for anyone acting on behalf of the Foundation or appearing as a collaborator with the Foundation to bribe any third party or to accept a bribe from any third party.

Staff Recruitment

During the recruitment of new employees, due diligence is carried out to determine, to the extent possible, whether the prospective employee might be at risk of bribing or being bribed in the course of their duties.

It is prohibited to hire anyone if there is a reasonable suspicion that they may attempt to bribe or be bribed.

Staff Remuneration System



The regular or exceptional remuneration of staff is determined by decisions made by the Foundation's competent executive bodies based on objective criteria and in line with prevailing market conditions. The Foundation will not provide any remuneration without a prior decision by the competent executive bodies.

Licensing and Public Authority Inspections

Whenever administrative permits are required to serve the legitimate interests of the Foundation, all relevant legal procedures must be adhered to. Any attempt to unduly influence the outcome or timing of the issuance of such permits is strictly prohibited.

Payments or the provision of any other benefit to public employees, officers, or public officials to avoid or influence an inspection, or to prevent a fine being issued against the Foundation, are strictly prohibited.

Money Laundering

Any activities relating to money laundering are in direct opposition to the principles and values upheld by the Foundation.

The Foundation complies with all laws and regulations concerning the prevention of money laundering and is committed to reporting any suspicious behaviour to the relevant authorities.

Conflict of Interest

- All individuals employed by or collaborating with the Foundation must promptly disclose any personal interest, or that of their relatives, that could potentially conflict with the Foundation's interests, hinder their ability to perform their duties effectively, or influence their decision-making, in order to avoid conflicts of interest.
- They are required to declare any relationships with suppliers or recipients of grants or awards from the Foundation to prevent any potential conflicts of interest.
- They must refrain from establishing any joint or mutual financial or other interests with suppliers or recipients of grants or awards from the Foundation.
- They must not engage in lending or borrowing from suppliers or recipients of grants or awards from the Foundation.



- They must treat suppliers, grant recipients, and awardees of the Foundation with impartiality, avoiding favouritism or discouraging cooperation without valid, objective reasons.
- They must not abuse their position to gain advantages or benefits for themselves or their relatives from suppliers, recipients of grants, or awardees of the Foundation.
- They are required to disclose any close family, personal, or social relationships with public employees, public office holders, or political figures that may be relevant to the duties assigned to them by the Foundation.

The above disclosures must be made by employees not only at the time of their hiring but also whenever there is a relevant change in the circumstances of their work.

Suppliers and Partners

Suppliers and partners of the Foundation are strictly prohibited from making, promising, or authorising, either directly or indirectly, the unlawful payment of money or the provision of any goods of value to public employees, officers, or public officials with the intent to influence them to take any action or make a decision for personal gain.

In the event that a supplier, partner, or any individual acting on behalf of the Foundation receives or perceives a request or demand for bribery in connection with their work for the Foundation, they must immediately report it, in accordance with the Foundation's Whistleblowing Policy.

The nature, type, and extent of due diligence conducted on the Foundation's suppliers and partners prior to entering into agreements depend on the likelihood of bribery risk. The method for selecting suppliers, partners, signing contracts, and monitoring their performance follows the relevant institutional procedures of the Foundation, as applicable at any given time.

Warning Signs - Red Flags

Individuals working for the Foundation should be aware of the following warning signs, so that they can report any issues that may relate to matters governed by this Foundation Policy. These warning signs do not, by themselves, prove suspicious or illegal activity but may indicate the need for further investigation or appropriate action.



The following warning signs are indicative, and individuals working for or collaborating with the Foundation should not rely solely on these when deciding whether to report.

Suppliers and Partners

- A request for payments to be made for goods or services provided to third parties unrelated to the commercial transaction.
- The compensation for goods or services provided is unusually high in comparison to standard market prices.
- A request for the invoice of goods or services to reflect a price higher than the actual value of the products or services provided.
- The invoice for goods or services lacks a detailed description of the offered items.
- A request for payment for goods or services to be made to a country that serves as a hub for offshore companies.
- A request for payment for goods or services to be made to two or more separate accounts.
- The individual – supplier/partner has been subject to criminal or civil proceedings for acts that demonstrate illegal, improper, or unethical conduct.
- The individual – supplier/partner refuses to unequivocally commit to adhering to the Foundation’s Policy on the Prevention of Bribery.
- The individual – supplier/partner refuses to provide clear and adequate responses to due diligence questions regarding bribery or provides misleading answers.

Recipients of Grants

- The (potential) grant recipient or their representative initiates contact with Foundation employees outside of the Foundation’s premises in an attempt to influence the funding process.
- Submission of forged documents (whether physical or financial).
- There are reputational concerns about the (potential) grant recipient bypassing normal business channels or being involved in cases of bribery and corruption.

Other Cases



- An individual working for or collaborating with the Foundation attempts aggressively and without justification to take control of a specific project.
- An individual working for or collaborating with the Foundation makes significant errors in managing donations or third-party funding.
- An individual working for or collaborating with the Foundation causes unreasonable delays in processing grant requests.

Reports - Whistleblowing

Individuals working for or collaborating with the Foundation, as well as any third parties, are both encouraged and required to report any instances or suspicions of bribery immediately and without delay, in accordance with the Foundation's Whistleblowing Policy. This ensures that the appropriate Foundation bodies can address the issue, initially through the Foundation's Ethics Committee, which is established under the Foundation's Code of Professional Conduct.

If an individual who intends to report misconduct is unsure of how to proceed in a situation that may or could potentially violate this Policy, they should seek guidance from the Responsible Officer for the Receipt & Monitoring of Reports (ROMR) of the Foundation, as outlined in the Whistleblowing Policy.

No individual will face harm or penalty for raising concerns about bribery, corruption, improper actions to benefit beneficiaries, or for refusing to engage in bribery, either as a giver or receiver.

Individuals also have the right to submit their report anonymously if they so desire.

It is important to note that retaliatory or malicious reports without evidence are prohibited. The Foundation's Ethics Committee and/or other relevant bodies responsible for the Foundation's programmes are authorised and obligated to investigate all reports of bribery, regardless of their source (employees, grant recipients, public bodies, suppliers, or other third parties).

For more information on how to report issues related to this Policy, please refer to the Foundation's [Whistleblowing Policy](#) and the Foundation's [Code of Professional Conduct](#).

Compliance with Laws



A core principle of the Foundation is strict adherence to and respect for the laws, regulations, and guidelines of Greece and the European Union. It is the personal responsibility of the members of the Board of Trustees, Committee members, employees, and collaborators to avoid any illegal activity.

The Foundation regularly monitors legislation and updates its relevant procedures and practices as needed, ensuring that all involved parties are kept informed.

Record Keeping

The Foundation maintains accurate financial records and implements appropriate internal controls to document the justification for each payment of operational expenses.

All accounts, invoices, and other documents related to financial transactions must be completed and kept with strict accuracy and completeness. The creation or maintenance of accounts outside the Foundation's official records is strictly prohibited.

Monitoring and Review

The effectiveness of this Policy's implementation is regularly monitored and evaluated to assess its adequacy and sufficiency. Any necessary improvements will be implemented promptly.

Periodic audits will be carried out to ensure compliance with this Policy, relevant legislation, and the Foundation's guidelines. These audits may be conducted internally or entrusted to external auditors.

Summary

The Foundation does not tolerate any form of bribery or corruption, and under no circumstances will it provide, offer, or offer to provide, approve, or request someone to provide, directly or indirectly, any form of benefit to any individuals, in exchange for them breaching their duties through acts or omissions.

The Foundation will not, under any circumstances, request or accept, directly or indirectly, any form of benefit or the promise of such benefits, with the intention of causing or rewarding improper conduct through acts or omissions that arise from or conflict with an individual's duties.



This Policy applies uniformly to all forms of cooperation the Foundation engages in with third parties.

This Policy sets out the framework that all members of the Board of Trustees, Committee members, and individuals working for or collaborating with the Foundation must adhere to, regardless of the personal ethics or subjective assessments of those subject to this Policy, or any distorted commercial ethics. All individuals subject to this Policy must fully understand and comply with its requirements, as they are defined at any given time.

Any deviations from this Policy, whether intentional or unintentional, may result in disciplinary actions, which could include dismissal for serious misconduct and criminal prosecution, in accordance with applicable law.

Compliance with the requirements of this Policy and the Foundation's Bribery Prevention System is continuously monitored, either by the appropriate Foundation personnel or by external oversight bodies.

The Responsible Officer for the Receipt & Monitoring of Reports (ROMR) of the Foundation is available to anyone wishing to report a complaint or seek clarification and advice on matters related to this Policy.

This Policy was approved at the 611th meeting of the Board of Trustees of the Foundation, held on 21st March 2025, and is subject to regular evaluation of its effectiveness. The Foundation reserves the right to make additions or amendments to this Policy in accordance with applicable legislation. This Policy will take effect from the date of signature by the President of the Board of Trustees of the Foundation and will be published on the Foundation's website in both Greek and English. In the case of any discrepancy between the Greek and English versions, the Greek version will prevail.

Athens, 21st March 2025

The President of the Board of Trustees

Athina Dessypri