

Policy for the Prevention of Corruption, Asset Laundering and or Financing of Terrorism



STRACON is committed to maintaining the highest standards of integrity, ethics, and good corporate governance, therefore it rejects any act of corruption, asset laundering and or financing of terrorism.

In this respect, STRACON is committed to the following guidelines in order to prevent any act of corruption, asset laundering and or financing of terrorism:



1. Adopting a “Zero Tolerance” policy towards acts related to bribery, corruption, money laundering, and/or terrorism financing.



2. Providing annual training to employees regarding the measures adopted by STRACON to prevent any act of corruption, asset laundering and or financing of terrorism.



3. Complying with all applicable laws and regulations regarding anti-corruption and prevention of money laundering and/or terrorism financing in the jurisdictions where STRACON operates.



4. Maintaining accurate and transparent records in all our operations.



5. Undertaking due diligence when contracting third-parties who act on behalf of STRACON, its providers and or employees.



6. Undertaking due diligence when evaluating clients and partners, in order to prevent the receipt of funds from illicit activities.



7. Requiring employees to report any case of bribery or blackmail.

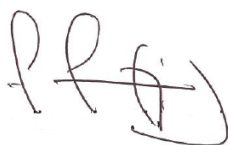


8. Emphasizing that personal interests of employees, directors, and shareholders should never take precedence over those of STRACON.



9. Disciplining employees for any breach of our Code of Ethics and the Manual for the Prevention of Corruption, Asset Laundering and or Financing of Terrorism, which could lead to the termination of the employment of those responsible.

Our Code of Ethics and the Manual for the Prevention of Corruption, Asset Laundering and or Financing of Terrorism complements this Policy.



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