

Code of Ethics

Code: KΔ

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1. Introduction

The ECO Hellas Code of Ethics (hereinafter "the Code") is designed to promote a common corporate culture that encourages behaviors based on the best principles of business ethics, reflecting a standard for proper business behavior and ethics of employees and corporate values.

The Code, give guidance to the employees to recognize ethical issues and to make decisions for such issues. The set of principles and rules describes the behavior expected of employees, as well as the way in which business cooperates with customers, suppliers and partners.

The Code establishes the foundations of corporate integrity and is binding on all company personnel and does not cover all the legal requirements derived from company's compliance framework. Violations of the Code may therefore result in serious consequences.

2. Areas of application

The areas covered by the basic principles of the Code of Ethics are shown in the figure below:



3. Basic Principles

3.1 Labor Relations and Practices

The working relationships are based on mutual respect, transparency, integrity, justice while at the same time the Company commits to monitor and comply with human rights legislation.

The Company creates the appropriate working conditions for employees, in order to express in the work environment their ideas, beliefs and opinions. Moreover, it encourages honest and two-way communication, on any matter related to work and the company's activity.

3.2 Avoiding Harassment and Violence

No employee shall be subjected to physical, sexual, racial, psychological, verbal or any other form of harassment or violence. Every employee must immediately report to the Compliance Manager any incident (violation of basic rights, use of force or harassment) that comes to his attention.

3.3 Non-discrimination

The company takes every possible measure to avoid discrimination based on race, religion, origin, age, special needs, sexual orientation, political beliefs, gender or family status in all company processes (recruitment, promotion, dismissal, training, etc.).

The company respects the dignity of every person it works with and protects the diversity of its employees and partners.

3.4 Equal opportunities

The company provides equal opportunities to all employees. All actions related to employees such as promotions, dismissals, remuneration, transfers to other Departments, participation in groups, etc., are based solely on merit-based criteria related to performance, ability, performance, efficiency and qualifications of each employee.

Each employee must treat colleagues, partners and suppliers with fairness and respect and not exclude them from the company's procedures, as long as they meet the conditions and conditions of cooperation.

3.5 Transparency in relationships

The company develops and creates stable relationships with its suppliers through transparency and honesty.

The integrity of actions and keeping promises are basic principles in the company's relations with customers.

3.6 Corruption

Company's employees do not give or receive, directly or indirectly, bribes for business or financial gain. No employee shall offer or receive any gift or payment that constitutes, or may be construed to constitute, a

bribe. Any demand to receive or offer a bribe must be rejected immediately and reported to Management and the Compliance Officer.

The company investigates under a defined independent mechanism any complaint or suspicion or deviation and if corruption or bribery is revealed, it is punished by termination of cooperation and may incur civil and criminal penalties.

3.7 Conflict of interests

Every employee of the company must avoid any conflict of personal and professional interests that affects his duties and decision-making within the company framework. In the company's business activities, staff avoid dependencies, political, personal, financial and social conflicts.

In the event of a conflict, the employee informs immediately Supervisor or/and the Compliance Officer and follows his instructions based on the principles and values of the company. In case of dubious and latent management of the direct supervisor, then the employee appeals confidentially to the top management.

3.8 Company's property

Company's employees must make proper use of company assets and resources and for legitimate business purposes. Employees must not:

- Reproduce classified access materials or documents for personal use.
- Use company resources (including computers and other company resources, equipment, tools and machines) for other than the specified company use, as it derives from the duties and responsibilities of each job position.
- Allow company property to be used for illegal activities.
- Use company's property or databases for his own benefit.

3.9 Dissemination of Confidential Information

The company is committed to protecting the trade secrets and confidential information of its customers and partners. The employees of the company do not retain any right of ownership or privacy over all the information collected through, or stored on, the Electronic Information or other Systems, beyond the measure provided for or permitted by law.

The sharing of e-mails sent within the company to relatives or third parties is prohibited. It is also forbidden to send internal emails to personal ones.

It is forbidden to take photos and post them on social media within the company.

The company's information and personal data security policies and procedures are strictly followed.

3.10 Business gifts

The company's employees do not accept or give gifts to clients or professional partners beyond what is considered in the context of professional cooperation, e.g. calendars. For business gifts, the corresponding procedure of the Management System is followed.

3.11 Relationship with third parties

Supplies are made exclusively from evaluated and approved suppliers of the company. All procurement-related employees are aware of, accept and apply the Code and the Antibribery Policy.

The employee is obliged to inform the company if a relative is employed by one of the company's suppliers or partners.

3.12 Environment, Energy and Safety

The company monitors and is committed to the legislation governing environmental protection, energy management and workplace health and safety.

The company's employees and management adhere to the Procedures and Instructions that comply with current legislation and internationally recognized standards.

3.13 Social offering

The company considers important to contribute and help social groups and local communities taking into account their real needs. In addition, it carries out sponsorships and donations taking the pillars of its activity. All sponsorship and donation requests are evaluated based on a specific Management System process.