



## CODE OF ETHICS

At KATRADIS Group (hereinafter referred to as the Group), committed to operating collectively with ethics across the spectrum of our activities, we adhere to the highest principles of ethics, encouraging integrity, responsibility, transparency in all aspects of our activities, and we compose the following Code of Ethics.

The Code of Ethics applies to all stakeholders, especially the Group's human resources (including the Management Team) and reflects the values and practices that govern the company and its employees.

Through the Code, we declare our position on various issues concerning the Group (which are described in the respective sections) and provide relevant guidance.

The Code of Ethics is primarily sent to the directly interested parties by email and published on our website to ensure greater transparency.

### COMMUNITY

At the Group, we commit to consulting with the local community, aiming to create common benefit. We also commit to promoting economic development and social prosperity in the communities in which we operate through various actions.

Some of the specific actions we adopt include:

- Ongoing dialogue with local authorities to address the needs of the local community.
- Managing our business activities with respect to the local community and the environment.
- Prioritizing the hiring of individuals from the local community to combat local unemployment.
- Financial donations to projects and organizations that contribute to our values.

### HEALTH & SAFETY

We have developed a specific Policy for Health and Safety at work which interested parties and others may refer to.

### PERSONAL DATA

We have developed a specific Policy for the Protection of Personal Data which interested parties and others may refer to.

#### **DISCRIMINATION**

We have developed a specific Policy against Discrimination which interested parties and others may refer to.

#### **VIOLENCE & HARASSMENT**

We have developed a specific Policy for the prevention of Violence and Harassment at work which interested parties and others may refer to.

#### **OTHER HUMAN RIGHTS**

We have developed a specific Policy for the respect and observance of Human Rights which interested parties and others may refer to.

#### **ENVIRONMENT**

We have developed a specific Environmental Policy which interested parties and others may refer to.

#### **CUSTOMERS & PARTNERS**

At the Group, we commit to respecting both our customers and our partners and to operate with responsibility, honesty and reliability towards them.

Customer satisfaction is a priority for the Group, so we ensure the timely delivery of quality products, the excellent quality of the received products and the good communication with our customers. We also take care of resolving any problems that may arise. It should be noted that we have developed a specific Quality Policy to which anyone who is interested may refer to.

#### **USE OF EMAIL & ELECTRONIC MEDIA**

We have developed a specific Policy on the proper use of Email & Electronic Media which interested parties and others may refer to.

#### **CORRUPTION**

We have developed a specific Policy against Corruption which interested parties and others may refer to.

#### **HEALTHY COMPETITION**

The Group commits to supporting healthy competition as a fundamental value of its business activities.

Inspired by the belief that healthy competition is a driver for continuous improvement and the provision of high-quality products and services, we commit to maintaining integrity and transparency in our business relationships.

We apply ethical practices, avoid unfair behavior and respect the rules and laws governing competition.

We promote innovation and development with our commitment to the best value delivery to our customers and the continuous process improvement.

### **CONFLICT OF INTEREST**

The human resources should prioritize the interests of the Group. Specifically, it is forbidden to the employees of the Group, to be involved in conditions that contradict the interests of the Group and favor their personal benefit or potentially the benefit of relatives or other persons in their close circle.

If any further clarification is required regarding what constitutes or does not constitute a conflict of interest, you can address to Mrs. Lappa Eleftheria ([elappa@katradis.com](mailto:elappa@katradis.com), +30 210 4060336).

### **GROUP ASSETS**

The Group's assets and third-party assets should be used strictly and only for the reasons predetermined by the Group, in the manner determined, always with particularly careful and correct handling and by the appropriate individuals. The assets are divided into two categories, tangible such as machinery and intangible such as 'know-how'. It should be noted that we have established a specific Policy for information security which all interested parties should refer to.

### **COMPLIANCE WITH LEGISLATION, INTERNAL REGULATIONS & POLICIES**

At the Group, we commit to always faithfully follow the current legislation, internal regulations and the Policies we have created across the spectrum of our operations and activities. Our human resources must comply with all these directions. For this purpose, they are informed and appropriately trained.

### **COMMUNICATION**

It is forbidden for those without authority to be involved in discussions with the media, with customers and generally with any third party on matters related to the Group. At the Group, we commit to continuous consultation with the interested parties as we believe that this creates common benefit.

### **REPORTING**

Should anyone notice a breach of the Code of Ethics, they are required to promptly report it to Mrs. Lappa.

Complaints should be made by name, in written and should include the date of the incident, all relevant details of it, any evidence, the individuals involved in it, and the individuals who saw or know about it.

Those who saw the incident or know something about it must be objective and report everything they know.

All complaints will be investigated confidentially by a special committee appointed by the Group in order to form a complete and correct picture of the incident.

### **SANCTIONS**

Breaches of the Code negatively impact the Group. Should a breach be identified, the severity of the incident will dictate the response.

KATRADIS Group

Yannis Kontakis, General Manager