



CODE OF CONDUCT & BUSINESS ETHICS

This Code of Conduct and Business Ethics defines in the sections that follow the basic principles, positions and policies of HAITOGLOU BROS SA, according to which "the Company" (HAITOGLOU BROS SA) is committed through appropriate resources, means and procedures, to conduct its business activities with honesty, fairness and integrity, as well as in accordance with all applicable law.

The provisions of the Code constitute a commitment of the company to each "Stakeholder" (suppliers, customers, partners, employees, investors, owners, regulators, unions, competitors, society).

At the same time, they are a text of Fundamental Principles which must be accepted and promoted by the "Business Partners" of HAITOGLOU BROS SA. (suppliers, consultants, project contractors, sales representatives, subcontractors) in the context of carrying out their functions and their influence on the promotion of the described principles.

Through the observance of the code of ethics, HAITOGLOU BROS SA aims to operate with fair, environmentally responsible, ethical and sustainable business behavior in mind.

HAITOGLOU BROS SA seeks close cooperation with suppliers and other cooperating companies, with the aim of jointly creating added value for all stakeholders.

Principles of Human Rights & Labor Rights

Respect for human and labor rights.

The Company is committed to the full respect and protection of human rights in accordance with the principles of the Universal Declaration of Human Rights of the United Nations as well as labor rights as they derive from international conventions and legislation. Business partners are committed to taking measures to prevent, limit and remedy potential or actual human rights violations.

Prohibition of Child Labor

The Company prohibits the employment of persons below the statutory age limit of employees (18 years), with the exception of cases of vocational training of young people or internships within the framework of study programs. The company does not offer employment to children below the legal age limit for completing compulsory school education. The purpose of this fundamental principle is to protect children from any form of exploitation. The age of employees during the recruitment process should be verified with respect for the dignity of individuals. The business associates of HAITOGLOU BROS SA are expected to adopt and apply similar requirements in compliance with applicable law in their countries of activity.



Special protection for young employees

A necessary condition for the observance of this principle is the protection of young workers from working conditions that are harmful to their health, safety, ethics and development. It should be ensured that new employees do not work at night and that their working hours are not prohibitive either for their attendance at school or for their participation in vocational guidance and training programs approved by the competent authority.

Elimination of precarious employment

The specific principle, binds HAITOGLOU BROS SA and all business associates to enter into employment relationships which, on the one hand, do not cause insecurity (social or economic) to employees and, on the other, are carried out on the basis of specific substantiated contracts, in accordance with national law and international labor standards, with provisions for the protection of the employee. Employees must be fully informed before taking up employment of their rights, responsibilities and exact terms of employment, including working hours, salary and payment terms.

The Company commits and expects from its business associates not to use terms of employment, which deliberately deviate from actual and applicable legal and working framework. These include - but are not limited to - apprenticeships where there is no intention to offer regular employment, seasonal work, or emergency work that undermines employee protection.

Prohibition of forced labor

Any form of slavery, forced, involuntary labor is a fundamental violation of human rights and is punishable under this Code. HAITOGLOU BROS SA is committed to showing zero tolerance for any form of modern slavery and to operating ethically and with integrity.

In particular, all business partners must adopt a zero-tolerance policy and consent to the prevention, detection and reporting of modern-day slavery anywhere in the trade chain. It must be ensured that workers are not subjected to ill-treatment, any form of violence, or coercion. In any other case, the companies that will benefit from the use of the above-mentioned forms will risk being considered as associates of such practices.

All employees must be adequately informed of the disciplinary procedures and regulations, which should be set out in writing. At the same time, the business associates should allow the termination of the employment relationship and the free departure of the employees, provided that the employer has been informed in a timely manner.

The right to cooperate and collective bargaining

Adherence to this principle binds the company and expects all partners to respect the right of employees to assemble, and the establishment of collective groups and collective bargaining in a democratic manner, as well as their right to freely elect their representatives. At the same time, employees should not be discriminated against, because of their trade union activity.

If business associates operate in countries where trade union activity is illegal, they should respect this right by allowing employees to freely choose their own representatives with whom the company will negotiate labor matters.



Non-discrimination - Equal Opportunities

A basic principle of the code of conduct is to oppose any form of unfair or unlawful discrimination in the workplace. No discrimination or exclusion is acceptable on the basis of sex, age, religion, race, social origin, disability, ethnic origin, nationality, political views, sexual orientation, participation in collective bodies, marital status, illness or other condition/characteristic, which could be a basis of discrimination. Any form of harassment due to the above should not be accepted.

Zero tolerance in any form of discrimination is a fundamental principle of HAITOGLOU BROS SA, from the hiring of employees as well as throughout their cooperation and professional development. Unique evaluation criteria are the skills, qualifications, efficiency, personality and experience of employees.

Fair remuneration

The Company respects the right of employees to a fair and adequate remuneration, which will offer a decent living to themselves and their families. Minimum requirement is compliance with the wages and hours provided by the wage provisions and the relevant industry standards approved through collective bargaining. In addition, employees should be provided with all legal social benefits.

Payroll must be paid on time, regularly and full in cash. The amount of salary should be related to the skills and training of employees and should refer to normal working hours.

Decent working hours

In order to comply with this principle, the company ensures that the mandatory work does not exceed the prescribed hours as defined by the national legal framework, industry standards or collective agreements.

In exceptional cases where the use of overtime is necessary, they will be voluntary and will be used responsibly by the employer, without being used to replace normal work. Overtime should always be compensated with the projected increased rate as applicable.

Health and safety at work

The Company and its business associates must ensure the protection of the health and safety of employees, as minimum at the level defined by national laws. In case the legislation is weak or insufficiently implemented, the partners should comply with the relevant international standards. Vulnerable people such as young people and workers, pregnant women and people with disabilities or other vulnerable groups, should receive special protection and care.

The Company must ensure that there are systems for detecting, evaluating, avoiding and addressing potential threats to the health and safety of employees. Adequate professional medical care, as well as meeting basic needs such as access to drinking water, safe rest areas and dining and hygiene areas, should be a priority.

At the same time, effective measures must be taken to eliminate the possibility of accidents, injuries and / or illnesses that may either be related or occur during work. The company is committed to providing adequate and effective Personal Protective Equipment depending on the requirements of the object and workplace as well as adequate training for the safe execution of the work.



In addition, all necessary measures should be taken to ensure the safety of the premises and the condition of the equipment, so that the employees and business associates working in the facilities work in a safe and healthy working environment, in accordance with international recognized standards. HAITOGLOU BROS SA is committed to promoting well-being in the workplace and its continual improvement in health and safety at work. In addition, business associates should always provide adequate and effective personal protective equipment (PPE) to all employees free of charge.

Environmental Protection

The protection of the environment, the least possible burden, the ecological orientation and the sustainability, are a firm policy and a firm commitment of our company. Therefore, all business partners should comply with environmental protection laws and integrate measures to prevent and address potential environmental burdens, strengthening options and sustainability criteria in the context of their activities.

Principles of Business Ethics

Fight against corruption

HAITOGLOU BROS SA is committed to fighting corruption and expects the same from its business partners. Therefore, compliance with this principle means the non-participation of all associates in acts of corruption, extortion or embezzlement, as well as in any form of bribery. In addition, business associates undertake to refrain from any form of falsification of information or false statements while they are expected to maintain accurate information about their activities, structure and performance, which should be disclosed in accordance with applicable regulations.

Money laundering

HAITOGLOU BROS SA is not involved in any illegal financing or money laundering activities and always operates within the framework of the laws and regulations in the countries in which it conducts its business. Haitoglou Bros SA condemns such practices and commits against them in full compliance with applicable law.

Conflict of interests

Every employee in the company, including executives and members of the Board of Directors, must conduct its private activities in a way that does not conflict or appears to conflict with the interests of HAITOGLOU BROS SA.

Gifts, other Donations

It is expressly forbidden to offer / accept gifts from and to any customer or business associate for the purpose of gaining a business advantage or seeking unfair influence.

Data protection and confidentiality

HAITOGLOU BROS SA and each business associate should collect, use and process personal information - including that which comes from or relates to employees, business associates, customers and consumers - in accordance with relevant national data protection laws and regulatory requirements.



Confidential information and related files should only be used for internal purposes without being disclosed or made accessible to unauthorized third parties, unless otherwise authorized or the information is public. In any case, the disclosure of confidential information and data is accepted only when necessary. For example, in the case of working with external consultants, these consultants are required to sign a confidentiality agreement, unless they are subject to a relevant obligation under professional secrecy.

Unfair competition

HAITOGLOU BROS SA operates and runs on the basis of healthy entrepreneurship. It pursues business progress and development with integrity, in the context of healthy competition. It treats competition with honesty, integrity and fairness. It seeks competitive advantages resulting from the provision of quality products, the promotion of innovation, research and development and the building of relationships of trust with new or existing customers and markets. Fully complies with current antitrust and competition legislation.

Keeping records and accounting books

HAITOGLOU BROS SA has and maintains an audit system, books and records in compliance with international accounting standards and legal requirements. In the context of (internal / external) audits and accountability, the company ensures the provision of information, reports and statements with transparency and accurate recording of transactions and disposal / utilization of funds. of its essential elements.

Management Commitment

The Senior Management of HAITOGLOU BROS SA is committed to implementing and supporting the resources and instruments of this Code of Conduct.

Complaints Mechanism

HAITOGLOU BROS SA Encourages employees and other stakeholders to communicate their concerns about breaches / derogations from the application and principles of this Code of Conduct and Policy. Each report or complaint will be evaluated in an independent and objective manner in order to take corrective or remedial action where necessary. For this purpose, the company has mechanisms for submitting complaints and reporting complaints that ensure conditions of confidentiality and anonymity.

Thessaloniki, December 2021

The CEO

Nikolaos A. Haitoglou