

CODE OF CONDUCT AND ETHICS – CORPORATE RESPONSIBILITIES

Communication, Working Conditions and Employees Rights

The people working for us are the most important asset and our investment in them is an investment in the future and in the long run of our company. ASPIS SA has a clear policy for managing and developing its human resources. The said commitment is being implemented through the following:

- Compliance with Collective Labour Agreements, Arbitration Decisions and labour laws in general.
- Development and Implementation of Policies, which are notified to all employees.
- Continuous monitoring of remuneration paid to ensure that it is sufficient to meet basic needs and to comply with labour market trends.
- Conducting annual internal audits acting as a means of detecting any incompatibility in relation to the company's principles.
- Providing equal opportunities to all, regardless of gender, age, nationality, religion, disability, political beliefs, and sexual preference.
- Staff Satisfaction Survey.
- Establishment of employees' evaluation system.
- Defending the right to trade union and collective bargaining.
- Informing existing Suppliers and Subcontractors about the Company's practices regarding Corporate Social Responsibility.

Open Communication

Successful co-operation between Management and employees requires understanding both sides' roles and mutual respect and reliability.

Our purpose at ASPIS SA is to foster a climate of trust by encouraging open communication, as well as the submission of new ideas and initiatives aimed at improving our business and creating effective cooperation between us.

All employees are encouraged to discuss any issues occurred with their direct supervisor or, when communication with the direct supervisor is obstructed, with the superior manager.

In cases when the employee cannot communicate with his / her hierarchically superiors, we are in favour of an 'open door policy', providing all employees for the right and opportunity to discuss any work-related issue directly with the company's management.

Employees are encouraged to use all available communication modes to express any dissatisfaction, complaint or anything they wish to contact the Company's Management.

Complaint boxes are located at specific spots in the company's premises where complaints or other issues can be recorded in the available "Complaints / Personnel Communication Forms" located in the boxes. Complaints and / or statements submitted by staff may be anonymous. Whether anonymous or branded,

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they are taken into account and analysed as far as possible and resolved as soon as possible depending on their complexity, the latest within 3 months.

Through the occasional staff satisfaction survey and the use of the "Staff Satisfaction Survey" form, the employees of the company are provided for another communication channel to express issues that concern them, complaints, or new ideas.

In case of any staff complaints, non-compliance is identified in the organization and operation of the company and Procedures for Corrective and Preventive Actions are mobilized.

All cases of employees' complaints are reviewed during the Annual Management Review.

Equal Opportunities in Employment and Human Resources Development

ASPIS SA ensures fair and transparent procedures for the selection, recruitment, and promotion of potential and existing employees. We apply an objective recruitment system focusing on selecting candidates with scientific training, responsibility, reliability, teamwork and initiative. We also ensure that the recruitment process is documented, accessible, and objective and that it is not liable to bias or prejudice.

In particular, on employment matters, we stand for the following:

- We select, recruit and compensate all ASPIS SA people based on their qualifications for the work they have chosen to provide and without discrimination related to race, religion, ethnic origin, nationality, colour, gender, gender identity, age, nationality, sexual preferences, marital status, pregnancy, medical status, disability, or any other characteristics protected by law.
- We support and nurture the development of our people's abilities and skills through continuous education and training.
- We provide equal opportunities for education, training and promotion to all ASPIS SA people.
- We conduct performance evaluations that provide trustful and accurate feedback.
- We avoid biased behaviour or even its suspicion in the workplace, in accordance with the policies and procedures adopted by the Company.

Cooperation Termination

In case of cooperation termination with an employee, it is to be conducted in accordance with the applicable domestic laws and follows the policies of the human resources department of ASPIS SA.

This may occur:

- In case of important reasons concerning the employee's ability, behaviour or performance.
- When an employee has committed serious misconduct and violations of the Company's Code of Conduct and Ethics.
- When he has committed repeated and deliberate actions that harm the company.

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- When there is no longer a business need for the employee's specific position.
- Concerning a voluntary decision of the employee himself.
- As otherwise specified by the working conditions and provided for by the applicable legislation.
- In case of employees performing very poorly, the company proceeds to:
- Additional training in order to improve employee's performance.
- Repeats on a personal level and explains over again all the working rules and guidelines.
- Applies "on the job training" methodologies.
- Proceeds with dismissal, if after the above actions the employee's performance continues to be poor and not beneficial for the company.

Objective Performance Evaluation

All the staff is undergone an annual process of setting goals and evaluating the performance carried out by the competent superiors. Each employee is evaluated for his performance in achieving the agreed goals and demonstrating abilities / behaviours that comply with the company's values and policies. The abilities/behaviours evaluated include, among others, consistency in quality and professionalism, technical knowledge, responsibility, guidance and development of human resources, continuous learning and development of sincere and mutual trust.

Human Rights and Ensuring the Balance between Professional, Personal and Family Life

ASPIS SA's employment policy is consistent with corporate values, principles and standards. Considering that employees are the most valuable asset for achieving business goals, ASPIS SA has highlighted workplace hygiene and safety as well as the protection of human rights and the well-being of employees.

We acknowledge and promote the healthy balance between our employees' work and personal lives and respect their commitments outside the work environment.

Working Hours, Salary & Benefits

- The right to leisure is protected and no overtime is required.
- Salaries paid shall be at least in accordance with the thresholds set by law.
- ASPIS SA fully complies with applicable Collective Labour Agreements, Arbitration Decisions and the overall applicable labour legislation, working hours, annual leave and planned bonuses, allowances and other benefits.

Freedom of Association and Rights to Collective Agreements

In accordance with the law, as well as company policies and procedures, employees have the right to freely exercise their trade union rights for work-related purposes, and to participate in collective bargaining.



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Representatives of the organizations shall not be subject to discrimination and will have access to all workplaces, if required, to perform their duties.

Freedom to Participate in Strikes

ASPIS SA respects its employee's right to participate in strikes.

Confidentiality of Employees Personal Data

ASPIS SA respects the confidentiality of its employees' personal information (such as name, home address, social security number of insurance institution, evaluation data, etc.). The company collects and retains only the necessary data, which is required for its effective and lawful operation.

Any employee who has authorized access to an employee's personal data ought to:

- Ensure that he only provides this information to absolutely necessary and authorized persons.
- Ensure that he never provides this information to anyone other than ASPIS SA, unless required by law or under the special authorization of the employee.
- It is confirmed that this information is kept under security and restricted access.
- Avoid retaining this information for a period longer than it is necessary to achieve the legal or business goals for which it was obtained.
- Unless domestic law provides otherwise, employees should not look forward to privacy in the workplace communication or use of ASPIS SA information resources, since they both serve corporate and not personal / private purposes.

Zero Tolerance for Discrimination and Harassment

ASPIS SA prohibits less favourable treatment of persons, because of characteristics such as gender, race, religion, political beliefs and sexual preferences. We all ought to ensure the elimination of discrimination, due to:

- Gender
- Disability
- Family status
- Sexual preferences
- Age
- Political and philosophical beliefs
- Religious beliefs
- Trade union action
- Racial, social, cultural or ethnic background.



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This applies both to the recruitment of new employees and to decisions related to training, promotion, continuous employment and generally working conditions.

Moreover, we shall not tolerate harassment of any kind, including mistreatment, intimidation, and professional violence in any workplace context. We fully respect and implement the provisions of all applicable domestic laws.

As harassment we consider any unwanted behaviour, whether verbal, physical or visual, based on gender, race, age, religion, national origin or any other status, characteristic or trait of a person protected by applicable law.

ASPIS SA is committed to working with its employees in a safe and dignified environment where values, such as equality, justice, respect, courtesy and dignity, are prioritized. ASPIS SA has zero tolerance in cases of illegal discrimination or harassment, caused by an employee, supervisor, customer, supplier, consultant, visitor or other person at the premises of ASPIS SA.

Zero tolerance means that ASPIS SA will act promptly and appropriately if any breach of this policy is detected, which may result in disciplinary sanctions up to termination of the employment contract.

We should also ensure that our suppliers, customers, and business partners know and embrace ASPIS SA's policy on diversity and variety.

Minor Employed

The company's policy is not to employ, in any case, fully or part time, a paid or unpaid person under 16 years of age, and never more than 5% of the total number of the company's employees, between 16 and 18 years old.

Forced Labour

Under no circumstances, ASPIS SA uses forced labour. ASPIS SA employs only people who work on their own free will. Employees are also free to leave their employment or terminate their business relationship after a reasonable time notice.

Responsibilities

Responsible for the implementation of regulations relating to human rights.

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