

Code of Conduct

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1. General

This Code of Conduct (hereinafter referred to as the "Code") of FARCOS S.A., a public limited company with its registered office at the industrial area Nea Ra idestos, 57001, Thessaloniki, Greece, is addressed to all those who work for or cooperate with the Company, including, but not limited to, its directors, executive officers, and other employees. In addition to the Company's employees, we also encourage our suppliers to comply with the Code of Conduct to the extent that it applies to them.

The guiding principles of the Company in its relations with its employees are trust, respect, and the establishment of open dialogue and communication. Within organizational boundaries, each employee treats their colleagues with absolute respect and dignity. The Company makes every effort to establish and maintain successful employment relationships.

The same principles govern the relationships between supervisors and subordinates. Both are equally responsible for ensuring open and honest communication between them.

The Company's employees are obliged not to put their personal interests above company's interest and are required to comply with the applicable national legislation.

In the event of any questions or concerns regarding the interpretation or application of the Company's Code of Conduct, you should contact the Technical Director, the Financial Department, the President, or the General Manager of the Company.

2. Labor and Human Rights

To safeguard human rights and ensure a healthy and safe working environment, Farcom strictly adheres to the following:

The Company treats each employee with respect and ensures a healthy work environment where everyone is fully aware of their duties and responsibilities, while also supporting the development of their skills.

The Company selects, appoints, and remunerates all its employees and partners based on their qualifications and abilities, and the type and quality of work as it is performed. Under no circumstances, does it adopt criteria related to race, religion, nationality, color, sex, age, citizenship, sexual orientation, marital status, physical disability, or any other characteristics. The Company promotes diversity and equality as fundamental rights of its employees and a source of strength for the Company.

The Company does not employ children for its work. Child labor is defined in Greece as the work of any person under the age of fifteen (15); however, under no circumstances will we employ any person under the age of sixteen (16).

Sexual or other forms of harassment of the Company's employees by any person in the workplace is strictly prohibited.

The Company respects the privacy of its employees and prevents behaviours that may undermine their dignity. Equal opportunities are given to all employees without considering their personal preferences.

The Company strives to eliminate workplace hazards, provides a safe and healthy environment for its people, and complies with all applicable laws and safety and health standards in the workplace.

The Company ensures a safe, healthy, and sustainable workplace for all its employees and partners, prohibiting the possession, use, sale, or transportation of illegal substances/drugs, working under the influence of alcohol or other prohibited substances, and the possession or use of weapons or ammunition both on the Company's premises and during the performance of necessary work.

3. Bribery and Corruption

All transactions of the Company's companies are conducted in a lawful and ethical manner. Employees of the Company are prohibited from offering, providing, accepting, or promising, directly or indirectly, any undue financial or other benefit to a public or private official, with the aim of securing favourable treatment or a business advantage.

Furthermore, it is prohibited to offer, induce the acceptance of, or accept gifts and gratuities, in cash or in any other financial or material form, and to provide generally any benefit related to the performance of the duties of the Company's employees.

An employee or partner who commits the crime of bribery in the performance of their duties may be held civilly and criminally liable in accordance with the applicable legislation, and their employment relationship with the Company will be terminated.

3.1. Exceptions

Business Gifts and Entertainment

Business gifts and entertainment, often exchanged between business partners as a sign of respect, appreciation, and cooperation, which may include meals and drinks, tickets to sporting or cultural events, travel, accommodation, and other goods or services. However, issues may arise when such gifts interfere or give the impression of interfering with objective business decisions. For this reason, a maximum monetary value limit for gifts (€100) is set, which is not considered a bribe. However, even if permitted under applicable laws, the offering or acceptance of any gift, gratuity, or entertainment that may or could be considered to unduly influence a business relationship should be avoided. These guidelines apply even during traditional seasons or events where gifts are offered, such as birthdays, anniversaries, or other holidays.

Donations and Sponsorships to Charitable Institutions, Non -Governmental Organizations, and Organizations

As part of its corporate social responsibility activities, the Company may support charitable organizations or sponsor sports, cultural, or educational events or activities. However, in all cases, it must be ensured that contributions and sponsorships of a charitable and social nature are preferably offered to recognized organizations and in each case after appropriate research and evaluation, without any expectation of obtaining a business advantage or other preferential treatment in return.

Gifts of Insignificant Value

Gifts of insignificant value that fall within the scope of customary business practice (e.g., office supplies with a company logo, calendars) and symbolic gifts due to name days, religious holidays, or other occasions that are considered acceptable and offered within the context of social interaction are permitted. In the case of receiving such gifts, they must be reported to the authorities.

In every case **offering or accepting a gift in the form of money, regardless of amount,** is expressly prohibited.

4. Voluntary Contributions to Local Communities

Farcom, with a high sense of responsibility towards people and local communities, designs and implements voluntary activities to improve the living conditions and standard of living of local communities. More specifically, it has undertaken the following:

Thessaloniki Social Hair Salon: Financial and product sponsorship for the creation and operation of the Thessaloniki municipality's social structure, aimed at caring for homeless and impoverished citizens by offering free grooming services such as haircuts, showers, and styling.

"Melissa" Orphanage for Girls: Financial sponsorship and participation of more than 60 company employees who joined forces for a good cause, running the 21k Half Marathon and the 10k and 5k Health and Dynamic Walking Race to support the valuable work of the "Melissa" Orphanage for Girls.

Smile of the Child ("Xamogelo tou paidiou) : Donation of Products for the Christmas Smile Bazaar

Hellenic Association for Down Syndrome: Donation of Products

Friends of the KE.PE.P Agios Dimitrios: Donation of Products

Smile of the Child: Donation of Products for the Easter Smile Bazaar

5. Occupational Health and Safety

The protection of the health and safety of all the Company's employees or partners in all workplaces is a top priority for the Company.

In this context, the Company complies with the applicable legislation for the protection and safety of workers and with hygiene regulations.

The Company's employees and partners are obliged to respect and comply with the health and safety policies and standards defined. These include not only the legally required obligations but also the best practices of the industry to which the Company belongs and to ensure that it provides a healthy and safe working environment and cares for its customers and visitors to its premises.

6. Anti-Violence and Harassment Policy

Through its Anti-Violence and Harassment Policy and Internal Complaints Management, the Company expresses its commitment to addressing and eliminating violence and harassment in the workplace, with the aim of creating a work environment where respect for human dignity prevails. To this end, it is expressly and categorically stated that any form of violence and harassment that occurs during work, whether connected to it or arising from it, including gender-based violence and sexual harassment, is strictly prohibited.

More specific, but not limited to, the Company expressly states that the following are strictly prohibited:

- insinuations, ridicule, obscene, sexual or racist jokes or comments,
- use of offensive language when describing people with disabilities,
- comments about someone's appearance or character that cause embarrassment or discomfort,
- stalking, pursuit, and unwanted verbal or physical attention towards someone,
- sending sexually suggestive messages via SMS, email, social media, fax, or letter,
- offensive and persistent questions about someone's age, marital status, personal life, sexual interests or preferences, as well as similar questions about their race or nationality, including their cultural identity and religion,
- sexual gestures or persistent requests for dates or threats,
- insinuations that someone's sexual favours can advance their career or that refusing to engage in sexual relations can negatively affect their professional career in the company,
- rude gestures, touching, and any form of unwanted physical contact,
- spreading malicious comments or insulting someone, especially due to discrimination based on age, sex, marital status, cohabitation agreement, pregnancy and motherhood, any disability, sexual orientation, religion or beliefs,

verbal or gestural threats, insults in public or in private,
belittling or ridiculing a person or their abilities, either privately or in front of others,
outbursts of anger against someone,
the exercise of persistent or unjustified criticism,
exclusion from social events, work group meetings, discussions and collective
decision -making or planning,
cyberbullying,
offensive emails, letters, and phone calls.

This policy applies to and is communicated to:

The Management and members of "FARCOM S.A."
The company's employees, regardless of their employment status (fixed -term -
indefinite, part -time - full-time),
Persons employed by the company under a contract for services, a contract for
the provision of independent services, and a paid mandate,
Persons employed through third -party service providers,
Trainees and apprentices,
Volunteers,
Employees whose employment relationship with the company has terminated,
Prospective employees of the company,
Other persons who transact business or cooperate with the company.

The company, in cooperation with the company's occupational physician, informs
employees about the risks of violence and harassment, including sexual harassment, as
well as ways to prevent it. In particular:

Offers training and development programs to all its personnel, in cooperation with
the company's occupational physician.

Posts posters in the workplace and distributes printed material on combating
violence and harassment, ensuring that all persons falling within the scope of this
policy are aware of the company's policy and procedures regarding incidents of
violence and harassment and know where to turn if they are affected by violence
or harassment.

"FARCOM S.A." appoints Ms. Styliani Papoutsis as the responsible person for
informing and providing advisory guidance to personnel on matters relating to the
prevention and management of violence and harassment in the workplace.

The company trains its managers and supervisors to recognize violence and
harassment in the workplace and to provide the necessary support to their staff
and partners.

In addition, it encourages its employees to report incidents of violence and
harassment in the workplace that they witness. Any person who reports or

denounces an incident of violence or harassment in the workplace is protected from any form of retaliation and unequal or unfavourable treatment, provided that the report or denunciation was made in good faith and with a reasonable belief that the content of the report or denunciation was true.

The internal procedure for resolving problems related to incidents of violence and harassment in the workplace may be either informal or formal.

The purpose of the complaint or reporting procedure for incidents of violence and harassment is solely to inform all persons falling within the scope of this policy of the ways in which such incidents, as well as any violations or non-compliance with the provisions of this policy, will be reported. Any violation of this policy will result in the imposition of appropriate disciplinary measures, in accordance with applicable law and relevant company procedures, regardless of the position of the offender.

For any complaint or report of incidents of violence and harassment received by the company, all necessary measures will be taken to ensure the confidentiality of the identity of the person who discloses any relevant information.

All information provided will be subject to strict confidentiality and will be subject to a reliability check by appropriately trained personnel who have signed a confidentiality agreement.

Exceptionally, the identity of the complainant may be disclosed when: a) the complainant gives their written consent, b) disclosure of the complainant is required by law, c) the complaint is clearly fraudulent, and d) disclosure of the identity is considered necessary to prevent or reduce the threat to the safety of the company's personnel.

Employees who report incidents of violence or harassment, and in general, unacceptable behaviors in relation to this Code, will be protected from any retaliatory behaviors.

Complaints or reports of incidents of violence and harassment must be made in good faith. Complaints or reports containing knowingly false, malicious, or reckless allegations and claims may, depending on the circumstances, be subject to disciplinary or even criminal sanctions, in accordance with applicable law. Complaints or reports of incidents of violence and harassment must be based on reasonable suspicion and not on unfounded evidence or rumors. However, full proof of the complaint or report is not expected from the complainant himself, as this is a matter for investigation by the competent bodies and services of the company.

7. Environmental Protection

Limiting and reducing the environmental footprint of our operations and business activities is one of the Company's core commitments.

The Company has aligned its strategy with actions and initiatives aimed at protecting the environment and reducing its negative impacts. In this context, we have an advanced biological wastewater treatment system, through which liquid waste is managed, while we cooperate with appropriately licensed external partners for the management of solid waste. In addition, we quantify direct and indirect greenhouse gas (GHG) emissions related to energy and monitor and interpret their trend over time, aiming to mitigate climate change.

The Company's environmental protection policies focus on the continuous improvement of environmental management and the development of initiatives to protect the natural environment and the quality of life in the areas where its facilities are located.

We are committed to full compliance with all environmental legislation, including obtaining and maintaining all licenses and approvals required for our business activities, the proper handling, storage, and disposal of materials in accordance with relevant legislation, and the timely and accurate submission of required reports to the competent state authorities.

8. Customers and Suppliers

The Company provides all potential suppliers with equal and impartial opportunities. Supplier selection decisions are based on objective criteria such as price and quality, as well as supplier reliability and integrity. The provision or acceptance of any illegal inducements, bribes, or similar payments of any kind in the context of commercial agreements is prohibited.

The Company does not provide personal favours to customers regarding prices, promotional offers, or product promotion (marketing). The Company treats all its customers on the same basis of business ethics.

The Company avoids any business relationships with suppliers or partners that are known to operate with practices of employee abuse, such as child labour, corporal punishment, abuse of women, forced labour, or other forms of unethical and unfair practices. The aforementioned (practices) are condemned by the Company, which will immediately terminate its business relationship with the supplier or partner in question.

For this reason, any supplier/partner is required to provide proof of the minimum assurance of responsible practices in terms of occupational health and safety and compliance with labour laws. In addition, the demonstration by the supplier/partner of certifications, standards, and voluntary sustainability schemes, that prove the promotion of a healthy and fair working environment will be taken into account when evaluating the Supplier/Partner.

9. Handling Employee Complaints

The Company will not take any negative action or punishment against any person who submits a complaint, allegation, or report, or who participates in or assists in the

investigation of a possible violation of the Code of Conduct, unless such claim was knowingly false. The Company maintains the confidentiality of the details of such individuals and complaints to the greatest extent possible.

10. Reporting Violations

In accordance with the Whistleblower Management Policy, the Company strongly encourages employees who have knowledge of or reasonable suspicion of conduct in violation of the Code of Conduct or other Regulations to immediately report such incidents to the Responsible Person for Receiving and Monitoring Reports (RP), who is the body responsible for receiving and examining Reports, namely the Company's CFO's Executive Assistant, Styliani Papoutsis. The Company will not retaliate against any person who in good faith reports information about possible violations, or who participates in any investigation or process by the Company or the state authorities, unless it is found that the information provided was knowingly false.

The Company takes all necessary measures to maintain confidentiality and to avoid disclosing the identity of the individual and the information that the individual has submitted. Disclosure of the above takes place only when:

- it is deemed necessary to conduct an effective investigation and take appropriate action
- it is required by applicable law.

11. Maintaining the Code of Conduct

The responsibility for monitoring, implementing, maintaining, and reviewing the Code of Conduct is assigned to the Company's Technical Director. More specifically, their responsibilities are as follows:

- Reviewing and revising the Code of Conduct
- Collecting data and evaluating actions resulting from the application or non-compliance with the Code of Conduct
- Communicating the Code of Conduct to all stakeholders and ensuring the necessary means for its implementation

12. Non-Compliance with the Code- Consequences

The Code of Conduct has a "zero tolerance" policy for any behaviour that constitutes a violation of this Code. Accordingly, the Company will take all necessary measures to prevent behaviours that do not comply with the Code of Conduct and will implement appropriate corrective actions to mitigate the recurrence of similar behaviours. Company employees who violate the Code may face disciplinary consequences, which may include termination of their employment with the Company.

The CEO

Redestos, 27/11/2024 (v1)