



CODE OF CONDUCT IKTINOS HELLAS S.A.

INTRODUCTION

The Code of Conduct was designed to reflect the principles and rules that bind the Management of IKTINOS HELLAS S.A. towards employees and interested parties.

It confirms the Management's strong commitment for compliance with legislation and regulations, from the Company's ethics and it is the framework - guide of all employees' conduct towards all interested parties.

IKTINOS HELLAS S.A. is committed to the protection of human rights as set out in the UN Universal Declaration of Human Rights (UNDHR) both in policy-making and in practice.

The Company's Management, having a sense of responsibility and consistency, forms an environment of security, merit recognition and trust towards its employees and interested parties, which is governed by business ethics and justice.

The axes for the application of the Code of Conduct for IKTINOS HELLAS S.A. are:

- Professional Conduct Principles
- Business Relations
- Information Protection

A) PRINCIPLES OF PROFESSIONAL CONDUCT

The relationships between the People of IKTINOS HELLAS S.A. are governed by mutual respect, integrity, honesty, cooperation and commitment and are based on mutual trust, understanding and open communication.

In this context:

- The Company's practices regarding the conclusion of professional relations have been designed with respect to the fundamental principles and rights at work and comply with the applicable legislation.
- Equal opportunities are ensured, in recruitment, employment, professional development, payroll, during employment contracts, in compensations, in retirement, in concluding partnerships with suppliers.

- There is no discrimination in relation to ethnic origin, religion, political beliefs, gender, age, disability, financial status, physical or mental ability, sexual orientation.
- Respect for diversity is enforced and protected by Management, the interaction between employees with different views and beliefs is encouraged and any offensive behavior is rejected.
- Any form of abuse (physical & mental), sexual harassment as well as any form of harassment or intimidation is expressly prohibited.
- A healthy working environment is ensured, free from illegal or harmful substances by prohibiting the consumption of alcohol and drugs as well as smoking during working hours or indoors and in the Company's vehicles.
- Waste, damage, destruction and theft of corporate resources and corporate assets is avoided.

The violation of these principles is addressed with zero tolerance by IKTINOS HELLAS S.A.

B) BUSINESS RELATIONS

Legitimacy, integrity and justice are the foundation for all business decisions, for transactions as well as for the relations of IKTINOS HELLAS S.A. with interested parties.

Bribery and Corruption

All forms of corruption are condemned and any behavior that may simply suggest corruption is avoided.

It is prohibited to Management and the employees of IKTINOS HELLAS S.A.:

- to promise, offer and provide benefits to public officials in the Company's countries of operation to ensure more favorable behavior
- to receive benefits from third parties in order to influence a corporate decision-making favorable to the beneficiaries
- to seek benefits for personal or corporate benefit.

Sponsorships and Donations

Aiming at the sustainable development and prosperity of local communities, IKTINOS HELLAS S.A. implements Corporate Responsibility practices that include sponsorships and donations to selected organizations based on applicable law as well as anti-corruption policies.

Sponsorships concern organizations and events that operate either locally for the development of local communities or at industry level, highlighting the importance, history and culture associated with marble. They come in the form of financial support, financial coverage of needs or the

provision of specific items upon request. The management of sponsorships is made in a transparent manner and in some cases the reciprocal benefits are utilized with the appropriate promotion and communication services by the sponsorships' beneficiaries.

The donations are mainly aimed at organizations related to the relief of vulnerable groups, the well-functioning of local communities, the education of local people, the protection of the environment and sustainable development. In line with national legislation and anti-corruption policies, IKTINOS HELLAS S.A. makes monetary and other donations, from which it is not allowed to gain commercial advantage.

Sponsorships, donations and any kind of corporate contribution to political parties or political candidates are prohibited.

Business Relations

IKTINOS HELLAS S.A., operating in world trade and supporting free trade, complies with applicable commercial laws and regulations related to imports-exports control.

Integrity, trust and reliability are the basic principles that govern the relations of IKTINOS HELLAS S.A. with suppliers. The Procurement Department operates in accordance with the applicable laws of the countries of activity and is responsible for compliance with procurement procedures.

Fair competition is a basic principle of operation for the Management and the employees of IKTINOS HELLAS S.A. Agreements are not made with competitors, suppliers or customers that favor the reduction of price clearing as well as promote market segmentation policies per geographical area. Granting a competitive advantage to IKTINOS HELLAS S.A. through unfair or abusive means is prohibited.

IKTINOS HELLAS prevents laundering income from illegal activities.

Information & communications Protection

IKTINOS HELLAS S.A. has made the protection of information and data a significant matter ensuring stakeholders' trust.

Data Security

IKTINOS HELLAS S.A. protects the data of any interested party, customers, shareholders, partners, employees, partner organizations and companies, based on the legal framework and in accordance

with national law, using the available technical means and ensuring that access to them by an unauthorized source is prohibited.

Data Privacy

Taking into account the sensitivity of personal data that interested parties confide in IKTINOS HELLAS S.A., Management protects them responsibly ensuring a high level of privacy protection.

In parallel with the measures and procedures for the protection of data confidentiality on the Management's part, each employee of IKTINOS HELLAS S.A. has the obligation to protect all information and business documents concerning the Company and to transfer them only to authorized recipients inside and outside the Company.

Observing the Code of Conduct is a responsibility of the Management and the employees of IKTINOS HELLAS S.A.

The Code of Conduct is published on IKTINOS HELLAS website at www.iktinos.gr and is distributed to all employees.

For clarifications, questions related to compliance with the Code of Conduct, and in case of doubt, you can contact the Human Resources Department at hr@iktinos.gr