
	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

CODE OF ETHICS ΙΚΤΙΝΟΣ HELLAS SA CONTENTS

1	General	3
2	Employment Issues	3
3	Conflict of interest	4
4	Mass Media Requests	5
5	Financial and non-financial information	6
6	Bribery and corruption	6
7	Gifts and donations	6
8	Unfair trading exploitation of privileged information	6
9	Health and safety	7
10	Environmental protection	7
11	Assets of the Company	7
12	Information Technology Resources	8
13	Suppliers and Customers	9
14	External partners	9
15	Trade secrets and confidential information of third parties	9
16	Compliance with competition law	10
17	Retention of personal data files	11
18	Exploitation labor practices	11
19	Shareholder information	11
20	Dealing with employees who make complaints	11
21	Report of potential violations	12
22	Consequences of non-compliance with the Code of Conduct	12


	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

1. In general

This code of ethics ("Code of Ethics or Code") of the anonymous company with the name "IKTINOS HELLAS SA", (the "Company") is addressed to all those who work or cooperate with the Company, including but not limited to its directors, administrative officers her and the other employees. If you have any questions or concerns regarding the interpretation or application of the Company's Code of Conduct, you should contact the Company's Human Resources Department. The principles of the Company and its employees are those of trust and respect. The same principles govern superior-subordinate relationships.

2. Employment Matters

It is the policy of the Company to select, appoint and compensate all people who work or cooperate with the Company on the basis of their qualifications, on the basis of the work to be performed and not on the basis of race, religion, national origin, nationality, color, sex, age, nationality, sexual preferences, marital status, physical disability, or any other characteristics. The Company favors diversity as a fundamental right of its employees and a source of strength for the Company. The Company does not employ children for its operations. In Greece, child labor is defined as the work of any person under fifteen (15) years of age, however under no circumstances will we employ a person under sixteen (16) years of age. We prohibit the sexual or other type of harassment of Company employees by anyone in the workplace. The Company respects an individual's privacy and we collect, process, use and retain personal data of our employees only to the extent strictly necessary and in accordance with applicable national and international data protection laws. The Company strives to eliminate hazards in the workplace, provides a safe and healthy environment for its people and complies with all applicable workplace safety and health laws and standards. The Company helps maintain a safe, healthy and productive workplace for all Company people by prohibiting:

	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

- the possession, use, sale or transport of illegal substances/drugs while working for the Company.
- working under the influence of alcohol or other prohibited substances. You must immediately report to the Personnel Department any incident of use or possession of illegal and/or narcotic substances, alcoholic beverages or weapons.

3. Conflict of interest


You must avoid conflicts of interest and other situations that are potentially dangerous or damaging to the Company. Conflicts of interest can arise in many situations. When in any doubt, you should consult the Personnel Department.

Investments Do not make any investment that may influence your decisions during your employment or cooperation with the Company. Company policy prohibits Company employees from participating in companies or cooperating with third parties that pursue competitive purposes with the Company. In case you wish to acquire such participation or initiate such interests, you must first obtain approval from the Company's Management. If you had possibly made such participations or collaborations already before the start of your collaboration with the Company, you must report the relevant events to the Company's Management.

Another job Do not use the Company's brand name, facilities or materials for outside work unrelated to your employment with the Company without authorization from Human Resources.

Participation in boards of directors You must obtain approval from Company Management before agreeing to serve on a board of directors or similar body of another company or government authority or agency.

Protection of Company information and secrets The Company's trade secrets, know-how and generally any information concerning the Company's products and/or activity are the property of the Company. All employees who use the Company's IT systems must show special attention to matters of confidentiality with regard to the protection and security of data and information. In general, you should take into account that it is not allowed to disclose unpublished information to other persons outside the Company and/or to use said information for your own benefit or for the benefit of persons

	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

outside the Company. If you leave the Company, your obligation to protect the Company's data remains until the information becomes publicly available or until the Company no longer considers the information in question confidential. You should also note that any correspondence, printed materials, electronic information, documents or forms of any kind, know-how of specific processes, procedures, special ways in which the Company operates – confidential or not – are the property of the Company.

4. Media Requests

Requests for financial or business information about the Company from the media, the press, or the general public should be referred to the Company's corporate communications officer.

It is critical not to respond to any such request or contact, as any inappropriate or inaccurate response, even a denial or disclaimer of information, may result in negative publicity and could seriously affect the Company's legal standing. The above does not apply to requests concerning financial information published by the Company on the Internet and in print, such as the financial statements, or advertising announcements of the Company.


5. Financial and non-financial information

The Company's consolidated financial statements are prepared in accordance with International Accounting Standards (IAS).

Financial and non-financial data must be recorded and reported accurately, objectively and within prescribed deadlines.

6. Bribery and corruption

Company employees are prohibited from offering, providing, accepting or promising, directly or indirectly, any undue financial or other benefit to a public and/or private employee, with the aim of securing favorable treatment or a business advantage. The employee or partner who commits the crime of bribery in the performance of his duties may be charged with civil and criminal liability in accordance with the applicable legislation, while his employment relationship with the Company will be terminated.

	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

7. Gifts and donations

It is prohibited to offer, solicit to accept or accept gifts and donations, in cash or in any other form and generally to provide any benefit related to the performance of our duties. Acceptance of non-monetary gifts of small value is permitted only as part of normal business practice.

8. Unfair trading of privileged information


Employees of the Company who have access to privileged information that may affect the price of the Company's shares or other financial instruments must maintain the confidentiality of this information. Accordingly, they are obliged not to carry out any transaction regarding these shares, on their own account or on behalf of a third party, taking advantage of privileged information. In general, they must fully comply with applicable insider trading laws. For this reason, all employees must be aware of and comply with the applicable legislation.

9. Health and safety

Protecting the health and safety of all employees or partners of the Company 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 employees and with hygiene rules. Our employees and partners must respect and comply with the health and safety policies and standards set by the Company.

10. Environmental protection

Limiting and reducing the environmental footprint of our operations and business activities is one of the Company's core commitments. 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 areas where our facilities are located. We are committed to full compliance with all environmental legislation, including obtaining and maintaining all permits and approvals required for our business, proper handling, storage and disposal of materials in accordance with relevant legislation and timely and accurate submission of the required reports to the competent government agencies.

	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

11. Assets of the Company


The assets and resources of the Company must be used in an appropriate manner and only for the intended business purposes. Assets include both tangible (facilities, equipment, financial facilities, PC hardware and software, furniture, etc.), and intangible assets (trade secrets, patents, trademarks, intellectual property, information, etc.), but also the assets of third parties. Special care must be taken to avoid loss, damage, unnecessary expense or misuse of the Company's assets.

12. Information Technology Resources

Information technology resources include any computer equipment owned, leased, or rented by the company, regardless of location, including, without limitation, personal computers, laptops and their devices, network servers, and access devices internet, the Company's intranet and the electronic mail network (e-mail). All information technology resources of the Company are the property of the Company and include all information created, stored, or transmitted using the information technology resources.

The Company's information technology resources must be used for the Company's business purposes. Prohibited:

- Harassing, discriminatory, defamatory, fraudulent, or threatening messages, including messages with content offensive to any race, gender, age, sexual preference, religion, political opinion, national origin, disability status, nationality, gender identity or other protected characteristics by the applicable legislation.
- Sending, accessing, or storing any form of offensive or obscene messages or materials.
- Unauthorized distribution of the Company's proprietary, confidential, or trade secrets.
- Causing or permitting breaches of security or disruption of network communications, or improperly disclosing your password to others, or allowing others to use your password.
- Violations of the rights of any person or company, which are protected by applicable intellectual and industrial property laws, or by trade secret laws or similar laws.
- Violations of the privacy rights of any person protected by applicable law.
- Pursuing purposes not included in those of the Company or seeking cooperation with organizations, businesses or other bodies that pursue such different purposes.

	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date
		4/6/2022

Including religious or political bodies. Except where prohibited by applicable law, the Company reserves the right to monitor network equipment, systems and activities, including the Internet as well as any information stored on information technology resources in appropriate circumstances and always in accordance with applicable law on personal data protection and privacy of communication. In addition, for the purpose of maintenance, security, as well as for any compliance with legal or regulatory requirements, authorized personnel and/or third party service providers may obtain unrestricted access to the Company's information technology resources, to the extent permitted by law .

The Company reserves the right to terminate any user's access to the Company's Information Technology Resources at any time, with or without prior notice to such user.

13. Suppliers and Customers


We provide all prospective suppliers of the Company impartially equal opportunities. Their selection decisions are based on objective criteria such as price and quality, as well as the reliability and integrity of a supplier. Giving or receiving any illegal commissions, bribes, or similar payments of any type is prohibited. The Company does not provide personal favors to customers regarding prices, promotional offers, promotion (marketing) of products. The Company places all its customers on the same business ethics basis.

14. External partners

The Company's Code of Conduct is sent to potential suppliers and partners, who are urged to adhere to it during their cooperation with the Company.

15. Trade Secrets and Confidential Information of Third Parties

It is Company policy to respect trade secrets or proprietary information of third parties. This is especially important if you own or have become aware of trade secrets and/or confidential information from your former employers.

	Code of Ethics of IKTINOS ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date
		4/6/2022

16. Compliance with competition law Full compliance with the competition laws of each country where the Company conducts business is a rule of the Company.

The purpose is compliance for the benefit of consumers. Competition law ensures that businesses compete for business by offering lower prices, new products and better services and that they do not interfere with the forces of supply and demand in the market. Competition law also protects businesses from "predatory" or unfair actions by dominant firms, so that the playing field is open and fair for all.

17. Retention of Personal Data Records

The Company complies with all applicable laws regarding the secure retention of Company records (including paper documents and electronic data).

18. Exploitative labor practices


It is the Company's policy not to work with any supplier or partner known to operate with unacceptable employee treatment practices, such as child exploitation, corporal punishment, mistreatment of women, forced labor, or other forms of mistreatment. The above are not acceptable to the Company and if they become known to the Company, any business relationship with the said supplier or partner is immediately terminated.

19. Information to Shareholders

The invitations and decisions of the General Assemblies of shareholders are publicly announced in accordance with the applicable legislation. Shareholders can visit the Company's website, www.iktinos.gr to obtain information on the latest financial results and other business developments concerning the Company.

20. Dealing with employees making complaints

The Company will not take any adverse action or punishment against any person who submits a complaint, complaint, report, or person who participates in or assists in the investigation of a possible violation of the Code of Conduct, unless the said allegation was knowingly false. The Company will maintain the confidentiality of such persons' details and complaints to the maximum extent possible

	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

21. Reporting potential violations

If you know, or have reasonable cause to suspect, that a violation of the Code or other Company regulations has occurred, you must immediately report such events to the Personnel Department. The Company will not retaliate against any person who reports in good faith information about potential violations, or who participates in any investigation or proceeding by the Company or government authorities, unless it is determined that the information provided was knowingly false .

The Company will also take all necessary steps to keep the identity of an individual and the information submitted by that individual confidential and will disclose it only when such disclosure:

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

We provide the possibility of communicating possible violations for employees, suppliers, customers, other third party representatives and partners of the company in the following ways:


- e-mail, to the e-mail address: whistleblowing@iktinος.gr to which the Reports / Complaints Evaluation Committee has access.
- in writing, to the postal address: 7 Lykovrysosou, Metamorfosi Attica, 14452, for the attention of the Committee for Evaluation of Reports / Complaints.

Note: it should be stated either in the email or in the letter that it is strictly confidential and personal, so that it is not accidentally opened by third parties. (do not open it, e.g. some secretary)

- verbally by phone either to the Human Resources Director or the company's Internal Auditor

22. Consequences of non-compliance with the Code of Conduct

The Company's policy is a "zero tolerance" policy for any behavior that constitutes a violation of the Code of Conduct. The Company will then prevent conduct that does not comply with the Code and will stop any such conduct taking place as soon as possible immediately after it is identified. Company people who violate the Code may be subject to disciplinary consequences, which may include termination of employment with the

	Code of Ethics of ΙΚΤΙΝΟΣ ΕΛΛΑΣ ΑΕ	
	Issue : 1	Date 4/6/2022

Company. For clarification, for questions regarding compliance with the Code of Ethics, and in cases of doubt, you can contact the Human Resources Department at hr@iktinos.gr