



Subject: Code of Ethics

Application Areas
Perimeter: Greece

Contents

1. DOCUMENT AIMS AND APPLICATION.....	4
2. DOCUMENT VERSION MANAGEMENT	4
3. UNITS IN CHARGE OF THE DOCUMENT	4
4. REFERENCES	4
5. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY	5
6. DEFINITION AND ACRONYMS	5
7. INTRODUCTION	5
7.1. Protection of transparent dialogue with stakeholder	5
7.2. Unethical behavior	5
7.3. Value of reputation and fiduciary duties.....	6
7.4. Value of reciprocity	6
7.5. Validity and application of the code.....	6
8. GENERAL PRINCIPLES	7
8.1. Impartiality and non-discrimination.....	7
8.2. Honesty.....	7
8.3. Shareholder relations	7
8.4. Safeguarding shareholder value	7
8.5. The value of people	8
8.6. Integrity of the individual	8
8.7. Confidentiality	8
8.8. Equity.....	9
8.9. Transparency, completeness, correctness and truthfulness of information	9
8.10. Diligence and precision in operation and in the performance of contacts.....	9
8.11. Quality of services and products	9
8.12. Fair competition	9
8.13. Responsibility towards the community.....	10



Subject: Code of Ethics

Application Areas
Perimeter: Greece

8.14.	Environmental protection	10
8.15.	Data Protection.....	10
9.	Criteria of conduct	10
9.1.	Corporate governance.....	10
9.2.	Information processing.....	11
9.3.	Gift, gratuities and benefits.....	11
9.4.	External communications	12
9.5.	Recruitment.....	12
9.6.	Establishment of the employment relationship.....	12
9.7.	People Management	13
9.8.	Actions on work organisation	14
9.9.	Health and safety.....	15
9.10.	Data protection.....	15
9.11.	Integrity and protection of people	16
9.12.	Duties of people	16
9.13.	Information management	16
9.14.	Conflict of interest.....	17
9.15.	Use of corporate resources	17
9.16.	Impartiality and non-discrimination.....	18
9.17.	Contracts and communication to customers	18
9.18.	People behavioral styles.....	19
9.19.	Control of quality and customer satisfaction	19
9.20.	Customer engagement	19
9.21.	Choice of Supplier.....	19
9.22.	Choice of partners	20
9.23.	Integrity and independence in relations	20
9.24.	Safeguarding ethical aspects in procurement.....	21
9.25.	Environmental policy.....	22
9.26.	Strategies and instruments of the environmental policy.....	22



Subject: Code of Ethics

Application Areas
Perimeter: Greece

9.27.	Environmental communications.....	23
9.28.	Economic relations with political parties, trade unions and associations	24
9.29.	Institutional relations	24
9.30.	Stakeholder relations	25
9.31.	Contributions and sponsorships	25
9.32.	Antitrust and regulatory bodies	25
9.33.	Data protection authorities	25
10.	IMPLEMENTATION METHODS	26
10.1.	Tasks of the control & risks committee regarding implementation of the code of ethics..	26
10.2.	Communications and training	26
10.3.	Stakeholder reports.....	27
10.4.	Violations of the code of ethics	27

CHIEF OF PEOPLE CULTURE AND SUSTAINABILITY OFFICER



Subject: Code of Ethics

Application Areas
Perimeter: Greece

1. DOCUMENT AIMS AND APPLICATION

This policy defines Principia Energy Group of Companies code of ethics.

This procedure shall be implemented and applied to the extent possible within Principia Energy Group of Companies and in compliance with any applicable laws, regulations, and governance rules, including any stock exchange and unbundling-relevant provisions, which in any case prevail over the provisions contained in this document.

This document shall require a formal review when determined by the business to achieve continuous improvement or if required by law.

2. DOCUMENT VERSION MANAGEMENT

Version	Data	Main changes description
1	23/01/2024	First issuing of New Local Policy
2	22/04/2024	Change of Company name

3. UNITS IN CHARGE OF THE DOCUMENT

Process Owner responsible for drawing up the document: Human Resources

Responsible for collaborating on the document: HS&Q, Comms, LCA

Responsible for authorizing the document: Chief of People Culture & Sustainability, Chief Executive Officer

4. REFERENCES

- Human Rights Policy
- Zero Tolerance of Corruption Plan
- Compliance Program

List of documents issued by external organizations (laws, guidelines, regulations):

- * ISO 9001:2015 Quality Management System – Requirements;
- * ISO 14001:2015 Environmental management systems – Requirements with guidance for use;
- * ISO 45001:2018 Occupational health and safety management systems – Requirements;
- * ISO 37001:2016 Anti-bribery management systems – Requirements with guidance for use.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**5. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY**

Business Unit(s) this applies to: Principia Energy Group of Companies

6. DEFINITION AND ACRONYMS

Acronym and Key words	Description
The Company	Principia Energy Services & Principia Energy Group of Companies

7. INTRODUCTION

This Code expresses the ethical commitments and responsibilities in the performance of business activities and corporate operations assumed by the people of The Company and of the Group companies, whether they be directors, employees, or collaborators, in every definition of said legal entities.

7.1. Protection of transparent dialogue with stakeholder

Company aspires to maintain and develop the relationship of trust with its stakeholders, meaning those categories of people, groups, or institutions whose contribution is essential to the achievement of Company's mission or who have a vested interest in the pursuit of that mission.

Stakeholders are those parties with a direct or indirect interest in the Group's business, such as companies and trade associations, customers, the financial community, national and international institutions, civil society and local communities, the media, employees, suppliers, contractors and the organizations and institutions that represent them, partners construed as natural persons or legal entities having an interest in the Company related to the joint development of new projects.

7.2. Unethical behavior

Unethical behaviors in business operations harm the relationship of trust between Company and its stakeholders. Behaviors of any individual or organization that attempt to appropriate the benefits of the work of others by exploiting positions of strength are unethical and they lead to the assumption of hostile attitudes in relation to the Company.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**7.3. Value of reputation and fiduciary duties**

A good reputation is an essential intangible resource that, in external terms, favors investment by the financial community, enduring customer relationships, attraction of the best talent, trust among suppliers, and reliability towards creditors, while in-side the organization it is fueled by a collaborative climate with a work approach that is open to the inclusion of all diversities.

The Code of Ethics sets out the Company's special duties in relation to its stakeholders (fiduciary duties) and must be complied with in order to secure the Company's good reputation.

The Code of Ethics therefore consists of

- the general principles governing relations with stakeholders, which provide an abstract definition of the reference values in Company's activities;
- the criteria of conduct in relations with each category of stakeholders, which set out the guidelines and standards with which Company people must comply in order to remove risks of unethical conduct;
- the implementation mechanisms, describing the control system for compliance with the Code of Ethics and for its ongoing improvement.

7.4. Value of reciprocity

This Code is built around a concept of cooperation to the mutual benefit of the parties involved, in accordance with the role of each. The company therefore requires that each stakeholder deal with the Company in accordance with principles and rules inspired by a comparable understanding of ethical conduct.

7.5. Validity and application of the code

The principles and provisions contained in this Code of Ethics are addressed to the members of the Board of Directors, and the other control and supervisory bodies of The Company and the other Group companies, as well as managers, employees and collaborators connected to the Group by contractual relationships of any type, also occasional and/or solely temporary. The company also expects its suppliers and partners to adopt conduct in compliance with the general principles of this Code.

The Code of Ethics is applicable in all geographical areas in which the Company operates, with due regard for the cultural, social, and economic diversities from one country to another.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**8. GENERAL PRINCIPLES****8.1. Impartiality and non-discrimination**

In decisions that influence relations with its stakeholders (customer relations, shareholder relations, management of personnel or work organization, management of suppliers and partners, relations with the surrounding community and the Institutions that represent it), Company avoids all forms of discrimination based on gender, age, ability, nationality, disability, sexual orientation, ethnicity, religious beliefs, political opinions and any other form of diversity.

8.2. Honesty

Within the context of their professional activities, Company people must act diligently in compliance with the law, the Code of Ethics, and the Company's internal policies and regulations. The pursuit of the Company's interests cannot justify dishonest conduct under any circumstances.

8.3. Shareholder relations

The company considers it has a specific interest in guaranteeing an ongoing and open relationship with its shareholders in order to raise their level of understanding of the operations carried out by the Company and the Group. In this context, the Company maintains a dialogue with shareholders based on principles of fairness and transparency, in compliance with EU and national regulations concerning market abuse and also in line with international best practices.

8.4. Safeguarding shareholder value

To provide adequate remuneration for the risk assumed by shareholders in investing their own capital, the Company strives to ensure that its economic-financial performance is such as to protect and build its enterprise value.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**8.5. The value of people**

The company places its people at the center of its operations as an enabling factor to prosper in a constantly changing world. This is the reason for Company's insistence on protecting and enhancing the value of the people working in the organization, promoting continuous learning and career development.

The Company guarantees that its actions are not detrimental to personal dignity and autonomy, and that its work organization decisions are designed to safeguard the value of each individual and reconcile the requirements of professional and personal life.

8.6. Integrity of the individual

Company guarantees the physical and moral integrity of its people, working conditions that are respectful of personal dignity and personal freedoms, and safe and healthy workplaces.

In the performance of any activity, situations in which the parties involved in the transactions have a conflict of interest, even if it is merely apparent, must be avoided.

This means both the actual or apparent situation wherein the secondary interest (economic, financial, family or other) of the Company person interferes with or tends to interfere with the person's ability to make unbiased decisions in the best interest of the Company and to comply with his or her professional functions and responsibilities, and the situation wherein representatives of customers, suppliers, or public institutions act in their relations with Company in a manner that conflicts with the fiduciary duties associated with their position.

8.7. Confidentiality

The company guarantees the confidentiality of the information in its possession and does not search for confidential data except in cases wherein express and informed authorization has been granted and always in compliance with the law. Company people are also prohibited from using confidential information for purposes not connected to the exercise of their role, as in the case of insider trading or market manipulation. The company complies with the indications set down in the corporate policies and national and European data protection regulations to guarantee full respect of the privacy of all the natural persons with whom it interacts.

The Company also applies a policy of zero tolerance for any form of harassment, intimidation, mobbing, or stalking in the workplace.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**8.8. Equity**

In entering and managing contractual relationships that result in the establishment of work relationships, the Company is committed to applying principles of equity and fairness and avoiding all forms of abuse of authority.

8.9. Transparency, completeness, correctness, and truthfulness of information

Company people are required to provide complete, transparent, comprehensible, and accurate information, allowing shareholders to make independent decisions in the light of the interests at play, the alternatives, and any relevant consequences. In drawing up contracts that the Company issues its contractual counterparts with clear and easily understandable instructions concerning the conduct to be followed in all applicable circumstances.

8.10. Diligence and precision in operation and in the performance of contracts

Contracts and work assignments must be carried out in accordance with the matters openly agreed to between the parties. The company is committed to not exploiting any conditions of lack of information or incapacity to act affecting its counterparts.

Within the terms of any work relationship, situations wherein a party acting in the name of or on behalf of Company attempts to take advantage of contractual errors or unforeseen events to renegotiate the contract solely to exploit the counterpart's position of dependency or weakness, must be avoided.

8.11. Quality of services and products

The company orients its activity towards satisfying and safeguarding its customers, listening to requests that could lead to improvements in the quality of products and services. Company therefore orients its R&D and marketing activities towards the achievement of high-quality standards in its services and products.

8.12. Fair competition

The company upholds the principle of fair competition and refrains from collusive or predatory conduct and abuses of a dominant position.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**8.13. Responsibility towards the community**

The company is aware of the direct and indirect influence that its activities can have on individual conditions, economic and social development, and general well-being of the community, as well as its social relevance in the communities in which it operates. The company is thus committed to conducting its capital expenditure in a sustainable manner, respecting local and national communities, and promoting initiatives of cultural and social value.

8.14. Environmental protection

The environment is the primary asset that Company is committed to safeguarding; to this end, the Company plans its activities always seeking to strike a balance between economic initiatives and indispensable environmental requirements, awarding due consideration to the rights of future generations. Company is therefore committed to improving the environmental and landscape impact of its activities and eliminating risks to populations and the environment, not merely by complying with statutory regulations, but also by applying all the relevant advances in scientific research and best practices. The company is committed to guaranteeing affordable and clean energy, promoting decarbonization of generation, the development of renewable energy, and electrification of consumption.

8.15. Data Protection

Company adopts high standards in relation to the security and management of data concerning its employees, customers, and stakeholders. The company guarantees respect for the rights of data subjects and adopts policies and operating instructions to enhance the security of its applications and data processing activities. Data protection by design and by default are an integral part of its digitalization processes, as are risk analysis and the protection of sensitive data.

9. Criteria of conduct**9.1. Corporate governance**

Company's corporate governance system is inspired by international best practices. The corporate governance system adopted by Company and the Group is basically oriented towards the goal of creating value for shareholders over the long term, in the understanding of the social significance of the

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece

Group's activities and the consequent need to conduct them with due consideration for all the interests involved.

9.2. Information processing

The company processes stakeholder information with full respect for the confidentiality and privacy of the parties involved.

To this end, specific policies and procedures for the protection of information are applied and kept constantly up to date. In particular, Company:

- establishes an organizational structure for information processing that ensures proper separation of roles and responsibilities;
- classifies information according to increasing levels of sensitivity and adopts appropriate countermeasures in each processing phase;
- requires the third parties involved in information processing to sign confidentiality agreements.

9.3. Gift, gratuities and benefits

Any form of gift that exceeds or can be construed as exceeding normal commercial practices or courtesy, or that is in any way intended to obtain favorable treatment in the pursuit of any activity connected to Company, is prohibited. Specifically, it is prohibited to make any form of gift to public officials, auditors, Company directors, members of the control and supervisory bodies or their family members, capable of influencing their independence of judgement or securing any type of advantage.

This rule, which also applies without exception in countries where offering gifts of value to commercial partners is a customary practice, covers gifts promised, offered, or received. The term "gift" refers to any type of benefit (participation in conferences free of charge, hospitality, promise of employment, etc.). The Company repudiates practices not permitted by the law, by commercial practice, or by the codes of ethics, if known, of the companies or entities with which it maintains relationships. Gratuities offered by the Company are designed to promote the Company's brand image. Gifts offered and received must be handled and authorized in accordance with the company procedures and relevant policies and must be adequately documented.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**9.4. External communications**

Company's communications to its stakeholders (also via the mass media) are formulated in respect of the right to information; the release of false or misleading information or comments is prohibited in all circumstances.

All communications comply with the law, rules, and practices of professional conduct and are made in a clear, transparent, and timely manner, safeguarding also price-sensitive information and industrial secrets.

The Company avoids all forms of pressure or attempts to obtain favor in its dealings with the mass media. To ensure maximum access, all press releases are published on the link www.principia-energy.com

9.5. Recruitment

The evaluation of personnel to hire is based on the degree to which candidate profiles match the characteristics sought and the company's needs, in compliance with the principle of equal opportunities for all forms of diversity. The information requested is strictly related to checking the possession of the professional and aptitudinal characteristics the Company is seeking, without violating the private sphere or opinions of the candidate. Within the limits of the information available, the Company takes appropriate measures to avoid any form of discrimination, nepotism, or cronyism during the recruitment and hiring process.

9.6. Establishment of the employment relationship

Personnel are hired with proper employment contracts; no form of unregulated work relationships are tolerated. When the employment relationship is entered, each employee receives accurate information regarding:

- the characteristics of the job and the work to be performed;
- normative and remunerative aspects of the position, as governed by the national collective bargaining agreement;
- the regulations and procedures to be adopted to avoid possible health risks associated with the work activity.

This information is presented to the candidate in such a way that acceptance of the position is based on his or her full and effective understanding.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**9.7. People Management**

Company guarantees equal opportunities and non-discrimination in the management of its people, recognizing and appreciating the individual contribution of each. In the context of people management and development (e.g., promotions or transfers), as well as in the recruitment phase, the decisions taken are based on the correspondence between the required job profiles and the candidates' profiles and/or on considerations of merit (e.g., awarding of incentives based on results).

Access to roles and positions is also determined by considering competences and capabilities; in addition, the Company favors flexible forms of work organization – as far as compatible with organizational requirements – to facilitate management of parenthood and family care and assistance duties. People's evaluation is carried out in a broad manner, with the involvement of managers, and, as far as possible, parties who have had dealings with the evaluated individual. Within the limits of the information available and data protection requirements, the Company acts to prevent all forms of favoritism.

Disclosure of personnel policies

Personnel management policies are made available to all the people in the company by means of the corporate communication tools (Intranet, organizational documents, and communications).

Empowerment of people and continuous learning

Managers use and fully exploit all the professional skills present in the organization by using the available levers to promote people's growth and development. The exchange of feedback between all the people involved in order to assist continuous improvement of competences is of particular importance in this context. Company places in-house and distance knowledge sharing and training tools at the disposal of all its people to allow continuous learning and constant accumulation of soft and technical skills to build professional value, in compliance with personal aptitudes and also with the need to develop new skills to face new challenges.

In this context, Company considers "training" as a continuous stimulus for self-learning of the skills and know-how required to meet the needs of the various professional roles present and constantly evolving within the Group. Company encourages the ability of each individual to follow a training pathway that complies with his/her needs, interests, and aptitude, helping people to develop their potential, which varies from one person to another, placing the empowerment of people at the center of its Group people development strategy. For this purpose, in addition to technical-operational training Company promotes experience-based learning activities and constant openness towards the outside world in accordance with a principle of osmosis between the Company and the academic, scientific, and institutional world, and favors discussion and exchanges with other business enterprises. Also, to facilitate continuous training of skills and development of an enterprising and proactive spirit, Company offers people a global, accessible, and mobile online training platform on which the attendance of online and residential courses is tracked.

**Subject: Code of Ethics****Application Areas**
Perimeter: GreeceManagement of people's working time

Each manager is required to optimize the working hours of his or her people, requiring services that are in line with the assigned roles and with work organization plans. It is an abuse of a position of authority to make requests, implying that compliance is required by a hierarchical superior, for services, personal favors, or any conduct that violates this Code of Ethics.

Engagement of people

Engagement of people is essential to achieve the corporate objectives and it takes the form of active, collaborative participation based on independence of judgement.

The final decision-making process is conducted in accordance with various perspectives, as far as compatible with the requirements of the Company.

Accessibility

The company is committed to creating inclusive work situations, focusing especially on physical accessibility to workplaces, digital accessibility of information, documents, and communications, and specific needs for assistive work tools.

Flexibility and workplaces

Company favors flexible working methods, assuring equal opportunities for contribution and fairness in the assessment of people based on the results achieved and irrespective of the method of carrying out the work.

Well-being

The company strives to promote behaviors oriented towards work-life integration and is actively involved in promoting personal and organizational well-being as factors enabling the engagement and innovative potential of people.

9.8. Actions on work organisation

When reorganizing work activities, the value of people is safeguarded by providing training and/or professional retraining actions wherever necessary. To this end, Company follows the criteria listed below:

- the burden of work reorganization must be distributed as evenly as possible among all people, in line with the effective and efficient performance of the business operations;

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece

- a person can be assigned different responsibilities with respect to those previously carried out, in compliance with normative provisions, taking care to accompany the acquisition of new and diverse skills by means of adequate training, wherever the need is identified.

9.9. Health and safety

Company considers the health, safety, and psychological and physical well-being of people to be the most precious asset to be protected at all times of life, at work, at home and during free time, and is committed to developing, consolidating, and disseminating a robust safety culture within the entire scope of the organization.

The objective of Company is to guarantee a workplace free of health and safety hazards, to protect its people, and to constantly seek the necessary synergies not only within Group companies but also with the suppliers, companies, partners, and customers involved in its activities. For this purpose, a capillary internal structure, attentive to the evolution of reference scenarios and consequent changes in the types of risks, performs technical and organizational initiatives based on the following core principles:

- adoption and implementation of a health & safety management system in compliance with the international standard;
- assessment of all health and safety risks and adoption of a systematic approach to eliminate them at the source if possible, or to minimize them;
- adoption of the best technologies and working methods, oriented towards continuous improvement;
- adoption of an information and training program for workers.

In addition, Company is committed to ongoing improvement of the efficiency level of the corporate structures and processes that contribute to the continuity of services provided and to national security, including participation in civil defense events.

9.10. Data protection

Personal data protection is assured by adopting international standards and the related methods of processing and storage of personal data are defined with the support of the Data Protection Officer in compliance with company policies and the various European and national regulations. Company processes personal data in compliance with the fundamental rights of data subjects and observes the rights and principles recognized in law, notably respect for private and family life, the home and communications, personal data protection, freedom of thought, conscience and religion, freedom of opinion and expression, and freedom to impart information and ideas. Data protection standards also

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece

prohibit the disclosure/dissemination of the data subject's personal data without prior express permission, except in the cases provided for by law, and they establish the rules to allow each individual to consult the data protection practices.

9.11. Integrity and protection of people

The company promotes principles of diversity, inclusion, and equal opportunities, and is committed to creating a workplace in which people are treated fairly, guaranteeing the right to working conditions that are respectful of their personal dignity.

Company is committed to protecting the physical and psychological integrity and personhood of each individual and opposes all forms of behavior that result in discrimination in relation to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions, and all other forms of individual diversity, or that is detrimental to the person and his or her convictions or preferences.

Company does not tolerate physical, verbal, visual, or psychological harassment such that result in a workplace that is humiliating, hostile, intimidating, offensive, or unsafe. The workplace is construed as referring to any place in which work activities are carried out. In particular, the Company does not tolerate any form of harassment concerning sexuality and behaviors that could upset individual sensitivities (e.g., allusions, explicit remarks, or sexual advances).

Disparity of treatment is not considered discriminatory if it is motivated by objective criteria.

9.12. Duties of people

People must act in good faith to meet the obligations undertaken on signing the employment contract and to comply with the provisions of the Code of Ethics, assuring the required work activities; each individual is also responsible for reporting, via the specifically provided channels, any situation deemed to be potentially in violation of the Code of Ethics.

9.13. Information management

In order to guarantee the integrity, confidentiality and availability of information, people must know and implement the corporate information security policies.

Each person is required to draw up his or her documents using clear, objective, and exhaustive language, allowing any necessary checks to be carried out by co-workers, superiors, or external parties authorized to make such requests.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**9.14. Conflict of interest**

All Company people are required to avoid real or apparent situations wherein a secondary interest (economic, financial, family, or other) of the Company person interferes with or tends to interfere with the ability to make an unbiased decision in the best interest of the Company and to comply with the functions and responsibilities assigned.

Examples of situations that can give rise to a conflict of interest include, without limitation:

- holding a senior position (Chief Executive Officer, Director, Function Manager) and maintaining economic interests in suppliers, customers, or competitors (ownership of shares, holding of professional offices, etc.), also via family members;
- handling relations with suppliers, customers, or commercial partners while holding interests in them (e.g., conducting work/consultancy activities), also via a family member or an external party connected to the Company person;

A Company person who believes he or she is in a position of conflict of interest must refrain from making decisions related to the processes or issues in which the conflict of interest arises and report the matter using the methods provided for by the corporate procedures.

9.15. Use of corporate resources

Each Company person is required to make every effort to safeguard corporate assets by acting responsibly and in compliance with the operating procedures established to govern use of the assets, documenting their use accurately.

In particular, each person must:

- use the assets assigned to him or her in a careful and efficient manner;
- avoid improper uses of corporate assets that might damage them or reduce their efficiency or that are in conflict with the Company's interests.

Each person is responsible for protecting his or her assigned resources and must inform the units in charge promptly of any threats or events damaging to the Company. Company reserves the right to prevent misuse of its assets and infrastructure through the use of accounting, reporting, financial control and analysis, and risk prevention systems, all in compliance with the provisions of statutory law (the law on data protection, the workers' charter etc.).

In relation to IT applications, each person is required to:

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece

- comply scrupulously with the corporate security policies in order to avoid compromising the functional efficiency and protection of IT systems;
- not send email messages that are threatening or insulting, that contain vulgar language or inappropriate comments which may be offensive to the individual and/or may damage the corporate image;
- not visit websites whose contents are indecent and offensive.

9.16. Impartiality and non-discrimination

The Company undertakes not to subject its customers to arbitrary discrimination.

9.17. Contracts and communication to customers

Contracts and communications to Company's customers (including advertising messages) must be:

- clear and simple, formulated in a language as close as possible to the language normally used by the parties (e.g., avoiding clauses that can only be understood by experts when addressing

customers among the general public, showing prices inclusive of GST and illustrating each cost clearly);

- drawn up in accordance with statutory legislation, without resorting to evasive or improper practices
- complete, not omitting any relevant item that might affect the customer's decision;
- available on the Company's websites, where appropriate;
- accessible, in order to accommodate the needs of differently abled customers.

The purposes and recipients of communications determine which channel of contact is best suited to transmission of the contents time by time, without resorting to the use of excessive pressure or insistence and rejecting the use of misleading or untruthful advertising tools..

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**9.18. People behavioral styles**

Company's style of behavior in relation to customers is based on availability, inclusivity, respect, and courtesy in order to establish collaborative and highly professional relationships. The Company also undertakes to limit the formalities required of its customers and to adopt payment procedures that are simplified, secure and, as far as possible, digitalized, and free of charge.

9.19. Control of quality and customer satisfaction

The company undertakes to guarantee adequate quality standards of the services/products offered, in keeping with predetermined levels, and to periodically monitor the level of satisfaction achieved.

9.20. Customer engagement

Company undertakes to always respond to suggestions and complaints made by customers and consumer associations, making use of appropriate and timely communication systems (e.g., call center services, email addresses), paying particular attention to disabled customers. the Company informs customers that their communications have been received and the times necessary to answer the query, assuring anyway that such times are short.

9.21. Choice of Supplier

Purchasing processes are designed to obtain the maximum competitive advantage for Company while granting equal opportunities to all suppliers; they are also based on pre-contractual and contractual behaviors characterized by essential and reciprocal good faith, transparency, and collaboration.

In addition to guaranteeing the necessary quality standards, supplier services must proceed in step with the commitment to adopt best practices in terms of human rights and working conditions, occupational health and safety, environmental responsibility, and respect for data protection by design and by default.

In particular, the Company people assigned to these processes must:

- not deny anyone in possession of the specified prerequisites the possibility of competing for contracts, adopting objective and transparent criteria when choosing the shortlist of candidates;

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece

- ensure a sufficient level of competition in every tender with an adequate number of bidders. The company draws on a list of suppliers whose qualification criteria do not constitute an access barrier.

The key prerequisites for Company are:

- appropriately documented availability of means, also financial, organizational structures, planning capabilities and resources, know-how etc.;
- the existence and effective implementation of adequate corporate management systems in cases where the Company's specifications so require., as well as compliance to health and safety or environmental applicable laws.

In any case, if a supplier should act in a manner that is incompatible with the general principles expressed in this Code of Ethics in the performance of its activities on behalf of Company, Company is entitled to take all the appropriate actions, including the preclusion of other opportunities for collaboration.

9.22. Choice of partners

Selection of partners carried out before entering into new business relations in order to evaluate the reliability of the potential counterpart is regulated by specific internal procedures aimed at ensuring compliance with the requirements of the Code of Ethics.

9.23. Integrity and independence in relations

In the Company, relations with suppliers are governed by shared principles and are subject to constant monitoring. Such relations also include financial and consultancy contracts. Entering into contact with a supplier must always be based on extremely clear relationships, avoiding forms of dependence wherever possible. For example, without limitation:

- it is improper to convince a supplier to enter into a disadvantageous contract by holding out the possibility of a more advantageous contract in the future;
- the Company generally avoids long-term binding projects subject to continual renewals and price revisions and requiring short-term contracts;
- special care must be taken in drawing up and managing contracts with an estimated value of particular significance when considered in relation to the supplier's turnover.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece

To guarantee the utmost transparency and efficiency in the procurement process, periodic rotation of the people in charge of purchasing is encouraged, also adopting the following measures:

- separation of roles between the unit requesting the supplies and the unit signing the contract;
- adequate capacity to track the decisional process;
- retention of information and official tender and contractual documents for the periods established by statutory legislation.

Finally, to ensure transparent business relations, the Company carries out an assessment of the ownership structure of its suppliers whenever conditions exist to recommend this course of action.

9.24. Safeguarding ethical aspects in procurement

With the aim of bringing procurement activities into line with the ethical principles adopted, for certain contracts the Company is committed to demanding attributes of a social nature (e.g., by introducing specific sustainability parameters in its contract award formulas).

Violations of the general principles of the Code of Ethics will trigger disciplinary mechanisms, designed also to prevent offences in which administrative liability may accrue to the Company.

To this end, individual contracts are drawn up with specific clauses.

In particular, clauses are inserted into contracts with suppliers to require:

- the supplier's compliance with specific social obligations (e.g., measures that guarantee the respect of fundamental rights for workers, principles of equal treatment and non-discrimination, protection against child labor, or compliance with the principles of the Global Compact);
- the possibility of using monitoring actions to confirm that the requirements in question are satisfied.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**9.25. Environmental policy**

Company pursues objectives that are in line with its strategic goals in environmental matters.

Protection of the environment and natural resources, climate action, and contribution to sustainable economic development are strategic factors in the planning, performance, and development of the Company's operations.

To make use of all possible synergies, the definition and implementation of the environmental policy are managed in a uniform and consistent manner.

The management system adopted:

- defines the environmental and sustainable industrial development policies;
- prepares the guidelines for implementation of the environmental policy;
- identifies the indicators and ensures monitoring and control of the results of the Company's actions in terms of environmental impact;
- follows the evolution of national and international environmental legislation and drafts implementation guidelines for subsidiaries;
- oversees relations with environmental organizations, institutes, and agencies; promotes, implements, and coordinates understandings and program agreements with such entities and with public institutions.

Each Group company has reference roles and/or operating structures responsible for the tasks and specific issues.

9.26. Strategies and instruments of the environmental policy

Company's environmental policy is also backed by the awareness that the environment can provide a competitive advantage in a market that is increasingly large and ever more demanding with regard to quality and behaviors.

The Company's strategy is based on investments and activities that respond to the principles of sustainable development; in particular:

- allocating a significant portion of investments to power generation from renewable sources;

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece

- in the context of national and international bodies and programs, promoting activities and behaviors that consider the environment to be a strategic factor.

Company promotes the following environmental policy instruments:

- voluntary agreements with institutions and environmental and trade associations;
- environmental management systems certified to ISO 14001 and the European EMAS regulation (Eco-Management and Audit Scheme) and oriented towards achieving continuous improvement in environmental services and organization.
- a system for periodic reporting of environmental data that allows the performance of the various industrial activities to be monitored;
- environmental awareness and training activities for people, aimed at the internal diffusion of initiatives and increasing skills and professional expertise;
- programs for rational energy usage addressed to customers;
- implementation of portals devoted to dissemination of a “culture” of environmental protection and promotion of the Company initiatives concerning the territory.

9.27. Environmental communications

Company reports on the implementation of the environmental policy and the consistency between objectives and results by publishing an annual Sustainability Report that illustrates:

- the main environmental objectives and results (energy efficiency, development of renewable sources, water usage, emissions reduction, waste management, etc.);
- the most significant environmental events and/or projects (e.g., certification of Environmental Management Systems, plant upgrades, voluntary agreements, and various types of initiatives to protect the environment and the territory).

The Company undertakes to provide access to environmental information in compliance with industrial secrecy requirements.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**9.28. Economic relations with political parties, trade unions and associations**

Company does not finance political parties or their candidates or representatives in Greece or in other countries, nor does it sponsor conventions or festivals having the sole purpose of political propaganda. The Company refrains from applying direct or indirect pressure on politicians (e.g., through concession of the use of the Company structures, acceptance of staff hiring recommendations, award of consultancy contracts etc.).

The Company does not make contributions to organizations with which conflicts of interest could arise (e.g., trade unions, environmental associations, or consumer- defense groups): the Company may however cooperate with such organizations, also financially, and otherwise, on specific projects based on the following criteria:

- goals in line with the Company mission statement;
- clear and documentable allocation of resources;
- express authorization from the functions responsible for managing the relations in question.

9.29. Institutional relations

All relations with public institutions are based exclusively on forms of communication designed to evaluate the implications of legislative and administrative activities for the Company, to respond to informal requests and acts of inspection (interrogations, interpellations, etc.), or anyway to divulge positions assumed in relation to topics of relevance for the Company.

To this end, the Company undertakes to:

- establish, without any form of discrimination, stable channels of communication with all institutional counterparts at the international, EU, and local levels;
- represent the interests and positions of subsidiaries in a transparent, rigorous, and consistent manner, avoiding collusive attitudes.

In order to guarantee the maximum clarity, contacts with institutional counterparts are conducted exclusively through reference persons who have been vested with explicit mandates.

The Company adopts specific organizational models for the prevention of crimes against the public administration.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**9.30. Stakeholder relations**

The Company believes that dialogue with associations is strategically important for correct business development; the Company therefore whenever possible, attempts to inform and engage the most authoritative and representative associations concerning topics that affect specific stakeholder categories.

9.31. Contributions and sponsorships

Company uses the instruments offered by the current legal system (e.g., charitable donations, sponsorships, or entering into specific agreements), initiatives that may address social, or environmental topics, sport, entertainment, the arts, and scientific and technological disclosures. In particular, sponsorship activities must offer a guarantee of quality and they can comply with specific territorial requirements (where Company intends to support initiatives in areas of industrial interest) in close liaison with the entities active in the geographical areas concerned (by way of example, institutions, local authorities, third sector organizations) with which Company collaborates in the planning phase. In any case, in choosing the proposals to adopt Company pays special attention to all possible conflicts of interest, both personal and company (e.g., family ties with interested parties or ties with bodies that may, due to their roles, favor the activities of Company in some way).

Management of charitable donations and sponsorship activities is regulated by specific internal procedures in order to guarantee consistency, transparency, and compliance with the applicable legislation.

9.32. Antitrust and regulatory bodies

The company fully and scrupulously observes antitrust regulations, as well as those of market regulation authorities. The company does not deny, conceal, manipulate, or delay submission of any information requested by the antitrust authorities or by other regulatory bodies in the course of their inspections, and cooperates actively during any investigative procedures.

To guarantee maximum transparency, the Company undertakes to prevent the occurrence of any situations of conflict of interest involving the employees of any authority and their family members.

9.33. Data protection authorities

Company collaborates with the reference authorities for data protection matters via the Data Protection Officer, who is responsible for contact and management of investigation procedures in accordance with the provisions of the Group policy and regulations concerning data protection. The Data Protection Officer guarantees compliance with data protection regulations in the countries in which the Company operates in contact with its customers.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**10. IMPLEMENTATION METHODS****10.1. Tasks of the control & risks committee regarding implementation of the code of ethics**

In relation to the Code of Ethics the Company CEO is responsible for the following tasks:

- examining any amendments or additions to the Code of Ethics to be submitted to the Company Board of Directors for approval.
- check application and respect of the Code of Ethics by means of analysis and evaluation of the internal control system monitoring corporate processes having significant impacts on corporate ethics;
- monitor initiatives to raise awareness and understanding of the Code of Ethics;
- receive and analyze reports of violations of the Code of Ethics.

These activities shall be performed with the support of the company functions concerned, with unrestricted access to all documentation deemed to be useful.

10.2. Communications and training

The Code of Ethics is brought to the attention of internal and external stakeholders through specific communication activities (e.g., consignment of a copy of the Code to all Company people, dedicated sections of the Company Intranet and its website, inclusion of specific ethical clauses in all contracts, and so forth). In order to ensure that all Company people have a correct understanding of the Code of Ethics, the Company prepares and implements a training plan aimed at promoting knowledge of the principles and ethical standards. Training initiatives are differentiated in accordance with the roles and responsibilities of people; new recruits undergo a dedicated training program that illustrates the contents of the Code they are expected to observe.

**Subject: Code of Ethics****Application Areas**
Perimeter: Greece**10.3. Stakeholder reports**

Any Company's stakeholder may report violations or suspected violations of the Code of Ethics either to specific violation reporting channels or to the Report Receiving and Monitoring Officer (RRMO), which analyzes the report, contacting the author if necessary, and the person responsible for the alleged violation. The company takes steps to ensure that whistleblowers are not subject to any acts of retaliation, meaning actions that may give rise even to the suspicion of discrimination or penalization. In addition, confidentiality is guaranteed with regard to the identity of whistleblowers, without prejudice to legal obligations.

10.4. Violations of the code of ethics

The CEO reports violations of the Code of Ethics that are brought to its attention and the related proposals for corrective actions:

- to the Board of Directors in the most significant cases;
- to the corporate bodies of directly or indirectly controlled subsidiaries for the issues of competence.

Provisions consequent to verification of violations are defined by the competent corporate structures in accordance with the matters provided for by the applicable national legislation.