



attica
THE DEPARTMENT STORE

CODE OF CONDUCT & CODE OF ETHICS

Approved by the Board of Directors of the Company on 11/10/2024



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1. Introduction

1.1. About the Code

The Code contains the fundamental principles, values and rules that form the framework for corporate activities and guide day-to-day practice and behaviour. This set of principles and rules describes the behaviour we expect from our employees, as well as how we conduct business with our customers, suppliers and partners.

The purpose of the Code is to guide us in making decisions in situations where dilemmas may arise regarding the proper behaviour and deal with issues related to the principles and rules of business ethics.

We seek compliance with the principles of business ethics and conduct that the Company adopts in its relationships with and from all our partners (e.g. suppliers and other external personnel).

We are all obliged to study the Code and we must know that:

- ✓ The Code does not cover every possible eventuality, nor does it cover every issue in full detail. If a situation or its appropriate handling is not clear, we should seek guidance from our supervisor before taking any action.
- ✓ This Code does not necessarily include all legal and regulatory provisions that may apply to a particular area and in cases of conflicting or contradictory provisions, the applicable legal and regulatory framework of the particular area shall prevail.

The Code will be communicated to all employees upon their employment with the Company. In addition, it will be posted on the Company's website, so that it is readily available.

Scope of application

Adherence to the values, principles and rules of this Code of Conduct is the collective responsibility of the Company's entire staff in order to ensure that all our employees, suppliers and partners share the Company's core values. This includes all employees working on part-time or fixed-term contracts, as well as the Company's partners.

It is necessary for each of us to have a clear understanding of what ethically appropriate business conduct is expected and what the consequences will be in case of non-compliance.

2. Our Culture

2.1 Our Values

Honesty-Integrity



- ✓ We act with honesty and integrity in all our professional and business relationships, protecting the Company's interests above any personal gain.
- ✓ We promote transparency and open communication about the products and services we offer based on our expertise and years of experience.

Confidentiality

- ✓ We are committed to the proper use and protection of information relating to the Company, our suppliers, customers, partners and employees.
- ✓ We do not make any form of disclosure of information without having the legal or professional right to do so.

Equality

- ✓ We respect diversity and promote equal opportunities in the workplace.

Objectivity

- ✓ We treat our people objectively, not allowing bias, conflicts of interest and third-party influence on our professional judgement.
- ✓ We value flexibility, innovation and entrepreneurial spirit and accept diversity of views which we use in a constructive and professional manner.

Fair business practices

- ✓ We do not compete unfairly. We respect our competitors and apply fair business practices.

Creativity

- ✓ We promote creativity and innovation in everything we do.
- ✓ We encourage the development of new solutions and ideas that add value and improve the quality of our products and services.

Responsibility

- ✓ We act responsibly on the basis of our shared values and take responsibility for our decisions and behaviour.

Respect for society and the environment

- ✓ We recognise our environmental responsibility and act in ways that reduce the impact of



our activities on the environment.

- ✓ We respect society, do not take actions that could harm it and support giving back to the communities in which we operate.

2.2 Our responsibilities

We acknowledge that against:

- ✓ our Shareholders, we have a responsibility to protect their investment,
- ✓ our customers, we have a responsibility to provide high quality products and services,
- ✓ our employees, we have a responsibility to respect their rights, to pay them on fair and competitive terms and to encourage them to participate in the process of planning and controlling their work,
- ✓ our partners and suppliers, we have a responsibility to seek mutually beneficial relationships,
- ✓ society, we have the responsibility to develop our business activity respecting the law and our role as members of society, promoting sustainable development and respecting the rules of health, safety & environmental protection.

The Directors and supervisors of the Company have increased obligations regarding compliance with this Code and in particular they must:

- ✓ ensure compliance with this Code
- ✓ demonstrate ethics and behave within the framework of business ethics principles,
- ✓ act as models of conduct,
- ✓ foster an environment of honesty and transparency where employees feel comfortable to discuss issues of concern and report potential compliance issues,
- ✓ act promptly on employee complaints and notices of breaches or respond promptly when guidance is requested,
- ✓ ensure continuous education and training of employees on ethics,
- ✓ accept and answer employees' questions about the principles of the Code and the Company's values, policies and procedures.



2.3 Compliance with legislation

Our core principle is to comply with the laws and regulations in all the countries in which we operate.

We must all respect and observe the law in the exercise of our duties. There is no such thing as ignorance of the law and we are especially required to be aware of the issues related to the conduct of our business.

We must contact our supervisor if we need any clarification on the legal or regulatory framework.

3. Our relationships with third parties

3.1 Our Relations with Shareholders

Through the competent bodies, we ensure the provision of all necessary information and assistance regarding the legitimate exercise of the rights of the Company's Shareholders. Our established control mechanisms and procedures safeguard transparency and integrity vis-à-vis our Shareholders and reinforce their unwavering confidence in the Company.

3.2 Our Relationships with partners and suppliers

We ought to:

- ✓ apply appropriate procedures and checks when selecting a partner or supplier to form a view on their integrity, quality, suitability and reliability and to ensure that they have the expertise, capability, reliability and the required license to perform the assigned activities with competence and professionalism.
- ✓ We ensure that all agreements with suppliers, partners and third parties are made in writing and the goods and services to be provided and the fees to be paid are specified. These agreements must be in line with the logic of competition and the market and as determined by the applicable legislation and the internal procedures of each company unit, in conditions of transparency and fairness.

3.3 Our relationships with customers

Honesty and integrity

We apply best practices and standards of ethical and business conduct in all our relationships with customers:

- ✓ We act with the highest levels of professional integrity, honesty and consistency in all our professional and business relationships,



- ✓ We prioritize the satisfaction of our customers' needs,
- ✓ We strive to continuously improve the quality of our services and products,
- ✓ We show willingness and courtesy when communicating with our customers.

Mutual respect

We build on mutual respect with our customers:

- ✓ We seek meaningful and open communication with them, offering assistance where necessary,
- ✓ We aim at optimal cooperation and quality provision of services and products, based on our specialized knowledge and many years of experience.

4. Our relations with colleagues and employees

4.1 General principles

Respect for colleagues

We ought to:

- ✓ encourage and value diversity, different views and experiences, supporting honest and two-way communication and demonstrating a spirit of adaptability, moderation and compromise,
- ✓ develop relationships based on understanding and trust, demonstrating mutual respect for all employees,
- ✓ encourage criticism in good faith aimed at personal improvement and performance enhancement.

Use of substances

The working environment is free from the use of alcohol or other substances. No Employee:

- ✓ will consume alcohol or use drugs or illegal drugs at work.
- ✓ will come to work if he/she is under the influence of alcohol and drugs.
- ✓ will be in possession of alcohol or drugs and illegal medicines while working. The possession or trafficking of illegal substances and drugs on the Company's premises will be reported to the Police.



Health and safety

- ✓ The health and safety of employees during work is a major concern of the Company.

Ensuring the health and safety of our entire workforce is a key part of our broader business policy and philosophy. We monitor and control the relevant risks and take all necessary preventive measures against accidents and occupational diseases in the workplace. We have safety technicians and occupational physicians, and we follow all the rules and protective measures for the Health & Safety of the workplace.

Forced and child labour

We do not use any form of forced and child labour. Child labour is defined as the employment of any person below the minimum age permitted by the laws of the countries in which we operate.

4.2 Equal opportunities policy

We cultivate a corporate environment characterised by the principle of equality and respect for the individual rights of all employees.

We treat all existing employees and those seeking employment with the Company in an equal and fair manner, ensuring equal opportunities for growth and development. We do not tolerate any form of discrimination or harassment in the workplace and therefore we must comply with the applicable legislation on equal employment opportunities, including those related to discrimination, harassment and offensive treatment.

4.3 Evaluation

We follow an evaluation system for the objective and merit-based rewarding of our executives.

We evaluate the performance of our employees in order to provide them with appropriate training and guidance, to help them develop and cultivate their professional skills.

By setting specific targets, we ensure an objective way of evaluating - grading both quantitative and qualitative targets for all our employees.

The selection, recruitment and training of employees is based on criteria related to:

- ✓ qualifications and effectiveness,
- ✓ experience and knowledge,
- ✓ interest and creativity,
- ✓ other criteria relevant to the job in question.



4.4 Harassment in the workplace

Without prejudice to the specific provisions set out in the Labour Regulation and the policies of Articles 9 and 10 of Law 4808/2021, as applicable, every Employee of the Company has the right to be treated with dignity and respect. All forms of harassment and intimidation, for whatever reason, constitute an unacceptable behaviour which will not be tolerated by the Company. This Code is addressed to and covers all the Company's Employees regardless of their contractual employment status, including those employed under a contract of employment, independent services, remunerated mandate, those employed through third party service providers and persons attending training, including trainees and apprentices, former Employees whose employment relationship has ended and persons applying for employment, as well as all its partners and customers.

ALL forms of violence and harassment, whether related to or arising from work, including gender-based violence and harassment and sexual harassment, are **PROHIBITED**.

Any intentional discrimination based on age, sexual orientation, nationality, religion, race or disability is **PROHIBITED**.

The Company will show zero tolerance to any behavior involving any form of violence and harassment.

DEFINITIONS

- ✓ "Violence and harassment" means any form of conduct, acts, practices or threats thereof, whether occurring individually or repeatedly, which is intended to, result or is likely to result in physical, psychological, sexual or economic harm,
- ✓ "harassment" means any form of conduct which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, or aggressive environment, whether or not it constitutes a form of discrimination, and includes harassment on grounds of sex or other grounds of discrimination,
- ✓ "gender-based harassment" means forms of behaviour related to the sex of a person which have the purpose or effect of violating the dignity of that person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. These forms of behaviour include sexual harassment, as well as forms of behaviour linked to a person's sexual orientation, expression, identity or gender characteristics.

AREAS COVERED BY THE PROHIBITION

The prohibition of violence and harassment against all of the above persons applies to and includes the following incidents in the following areas:



- ✓ In the workplace, including public and private places and places where the employee is providing work, taking a break, in particular for rest or eating, in personal hygiene and care facilities, changing rooms or accommodation provided by the employer.
- ✓ Travel to and from work, other travel, trips, education, and work-related events and social activities and
- ✓ Work-related communications, including those carried out through information and communication technologies.

WHAT CAN BE CONSIDERED SEXUAL HARASSMENT

- ✓ Implying, proposing or demanding sexual favours of any kind.
- ✓ Invasion to another person's personal space (e.g. inappropriate touching).
- ✓ Stalking, intimidating, coercing or threatening a person for sexual favours.
- ✓ Sending or presenting sexual objects or messages.
- ✓ Questions of a sexual nature.
- ✓ Making comments about another person's appearance, dress, sexuality or gender in a derogatory or subjective way or in a way that makes them feel uncomfortable.
- ✓ Obscene comments, jokes or gestures that humiliate or insult the other person.
- ✓ Intense and persistent flirting without the willing participation of the other person. Also, flirting with someone at an inappropriate time (e.g. in a group meeting) is considered sexual harassment even when such comments would be welcome in a different setting. This is because such actions can damage a person's professional reputation and image and expose them to further harassment.

The most extreme form of sexual harassment is sexual assault. This is a serious offence and the Company will support employees who wish to prosecute offenders.

OTHER FORMS OF VIOLENCE AND HARASSMENT

- ✓ Deliberately undermining the work of any person.
- ✓ Engaging in frequent or unwanted comments of any nature about a person.
- ✓ Disparaging comments about a person's national heritage, race, or religious beliefs.
- ✓ Starting or spreading rumours/comments about a person's personal life.
- ✓ Moral harassment (mobbing) and subjecting a person to psychological harassment includes actions of constant negative comments or criticism, isolation, spreading gossip or humiliating the person to whom they refer.
- ✓ Bullying through vindictive, resentful, malicious or humiliating acts in order to demean a person.
- ✓ Verbal abuse - swearing, cursing, insults or use of derogatory language.
- ✓ Threatening behaviour including but not limited to hitting furniture or walls, shaking fists,



throwing objects or destroying property, etc.

The most extreme form of violence is physical violence. This is a serious offence and the Company will support employees who wish to prosecute offenders.

4.5 Information disclosure and Company's image

The Company's image is directly linked to the behaviour of each of us. We must therefore act in its best interests and express our values consistently in our daily professional behaviour.

In this context, we do not disclose Company-related information, either orally or in writing, on behalf of the Company or for personal purposes, unless we have received prior written authorization to do so from the CEO. Furthermore, we do not speak out on issues that are not within our remit. We do not use printed or electronic media bearing the Company's logo to communicate personal views or activities.

Also, information concerning the Company must be provided in an honest and consistent manner only by those who have the relevant authority and in strict compliance with their policies.

Unauthorised disclosure of information may damage the Company's reputation, credibility and image. Only authorised representatives of the Company, instructed to communicate and provide data and information about the Company to the general public and the media, may make statements or provide data and information.

In this context, we do not provide any corporate information or news that is not publicly available. Any question submitted by the media or other third parties should be directed to the person in charge of the role in order to be answered.

In the event that cooperation with judicial authorities has been requested, we cooperate fully and always in consultation and with the assistance of the Company's legal representatives.

4.6 Social media

We must adhere to the following principles regarding our use of social media:

- ✓ We should pay particular attention to the expression of opinions and personal beliefs and should not in any way create the impression that these are the Company's opinions or are directly or indirectly linked to them.
- ✓ We understand that the way we present ourselves reflects not only our own image, but also that of the Company.
- ✓ We are not allowed to disclose and publish information, in particular confidential or trade secrets concerning the Company, which we are aware of because of our employment. We



also do not conduct unauthorised discussions about the business activities or internal processes of our Company or about suppliers, customers and products made available by the Company.

- ✓ We are not allowed to publish offensive content, as well as inappropriate comments about the Company or other employees, its executives, members of its management, its parent company, members of its management and employees, as well as its customers, suppliers and partners.
- ✓ We must comply with the Company's policies and report incidents that come to our attention regarding their breach to the Company's Reporting Officer.

Public speeches and signed publications

We notify and obtain written approval from the CEO:

- ✓ prior to our participation as speakers in any presentation we will attend as representatives of the Company in order to receive supporting material and, if necessary, relevant guidance,
- ✓ before publishing any signed message or press release, in order to confirm that the text does not contradict the Company's strategic direction and does not put its reputation at risk.

In order for the CEO to grant us approval, he should be aware and have an overview of the situation and what is to be discussed, and we should provide him with all available information.

We avoid expressing opinions or answering questions when they do not fall within our area of expertise.

Crisis management

We are required to follow crisis management procedures in order to reduce the negative impact on the Company from a potential crisis.

Indicatively, measures should be taken to ensure:

- ✓ Consistent communication messages to all stakeholders,
- ✓ appropriate measures to minimise/prevent communication of unauthorised employees with the media,
- ✓ Timely and clear responses to requests from stakeholders where required.



5. Conflict of interest

Without prejudice to what is specifically set out in the "Policy and procedure for the prevention and handling of conflict of interest situations", which is an Annex to the Company's Operating Regulation, as it is in force from time to time and is communicated to all stakeholders via the Company's website, the following shall apply in particular:

5.1 Definition of conflict of interest

A conflict of interest arises when an employee is called upon to serve his/her own interests (financial and/or other), or the interests of a person (natural or legal) directly or indirectly related to him/her through a controlling relationship, in a way that competes with the Company's interests.

We are obliged to act in the best interests of the Company and to prevent, as well as identify conduct that may lead to any form of conflict of interest. We apply the Company's "Policy and procedure for the prevention and handling of conflict of interest situations" and the following and ensure that those who act on our behalf also adhere thereto.

General principles

We avoid any instance of conflict of interest, even the appearance of a conflict of interest, as this could cause a problem for the Company and jeopardize its credibility. We conduct our personal and other activities outside the Company in a manner that does not conflict or create the appearance of conflict with the interests of the Company.

In the event of a conflict of interest, we report it in a timely manner to the CEO and/or the Company's Reporting Officer.

In particular we notify of:

- ✓ existing conflict of interest situations,
- ✓ any relationship or significant financial interest we have with persons or companies with whom the Company does business that could lead to a conflict of interest,
- ✓ other situations which may give rise to a conflict of interest.

If we perform administrative tasks in the Company, we are obliged to inform as described above in all cases where any business or professional activities, agreements or partnerships may lead to conflicts between our interests and the interests of the Company.

Particular attention should be paid by members of the Board of Directors who are allowed to participate on their own behalf or on behalf of third parties in companies pursuing similar objectives to the Company, subject to the provisions of applicable law.



Conflicts of interest may arise in many situations and it is impossible to cover them all in the Code. In case of doubt, we must immediately inform the CEO and/or the Company's Reporting Officer in order to find an appropriate solution.

5.2 Bribery and corruption

Without prejudice to the specific provisions of the Company's "Anti-Bribery Policy", as it is in force from time to time and communicated through the Company's website to all interested parties, the following shall apply in particular:

Definition of bribery

Bribery means any gift, loan, fee, reward or other benefit given or received by any person to obtain, retain or direct a business option or decision or to secure any other advantage in a business option or decision or relates to a percentage of a contract amount. **It is prohibited for** the Company, its Employees and its representatives to offer, give, propose or knowingly accept bribery in any form. It is also **prohibited to** use any method or form of bribery or to receive bribes from customers, agents, contractors, suppliers, employees of any of the aforementioned persons or government officials. In particular, the Employee must not:

- ✓ give, offer or receive any payment, gift, hospitality, entertainment or other benefit if it may be intended for or construed as a reward or encouragement for favour or preferential treatment in connection with the Company's activities.
- ✓ Give or offer any payment (facilitation payment) to a government official, employee or public official of any country to facilitate or expedite a routine or necessary procedure.

This Code is not intended to exclude the exchange of gifts or acts of social courtesy, hospitality/entertainment between executives and employees, with external personnel, suppliers, customers and other third parties, which is common in the business world and especially in the retail industry, as long as they are carried out transparently and within the permitted boundaries, and as long as they do not leave room for negative criticism against employees and the Company.

We must report to the CEO and/or the Company's Reporting Officer all incidents of potential bribery or similar situations that could expose the Company to the risk of bribery.

Facilitation payments

We do not make any form of facilitation payment, even if this may result in commercial delays, such as paying a small amount to speed up the Company's application to a public authority.

If we are asked to pay a facilitation payment, or there are any suspicions, concerns or questions about payment, we report it to our immediate supervisor. If necessary, the CEO and/or the



Company's Reporting Officer should be informed as soon as possible in order to deal with the situation as appropriate.

Relations with public officials and regulatory agencies

Our contacts and relationships with public officials should not compromise the reputation and integrity of the Company. Particular attention should be paid to situations that may be considered as bribery on the part of the Company.

Political processes

We operate in a socially responsible manner within the framework of the law, seeking to achieve our business objectives. We respect our colleagues' active participation in political processes and their involvement in matters of public interest.

However, we must take any activity that involves our active involvement in politics outside the context of our work and make it clear that our political actions are about personal beliefs and are not associated with the Company. The Company does not take positions for or against any political party or organisation or their representatives.

Donations to political parties

We do not provide financial support to political parties and organisations or their representatives.

Donations and sponsorships to organisations

As part of our commitment to society, we as a Company may support local charities or sponsor, for example, sporting, cultural or educational events or activities.

Donations and sponsorships may be questionable if they are perceived by others as seeking to gain an unfair advantage. Thus, any donation or sponsorship must be transparent and properly documented.

Gifts, hospitality and entertainment expenses

We are prohibited from giving or receiving gifts that are intended, or give the impression that they are intended, to create or maintain a commercial advantage.

5.3 Fraud

Definition of fraud

Fraud is the act or omission of a person who, for the purpose of obtaining an unlawful pecuniary gain for themselves or a third party, damages another's property by persuading someone to act,



omit or acquiesce by knowingly representing false facts as true or by fraudulently concealing or suppressing true facts.

Fraud can be committed by one or two or more persons and can involve either employees or external personnel (customers, suppliers, subcontractors, etc.). The person committing fraud may seek direct benefit or indirect benefits such as power, influence, promotion or bonuses to the detriment of the Company, its profits, other employees, shareholders, suppliers and customers.

We do not tolerate any form of fraud or any acts or omissions that could expose us to the risk of fraud.

We must report to the CEO and/or the Company's Reporting Officer all incidents of potential fraud or situations that could expose our Company to the risk of fraud.

6. Use of information and data

6.1 Confidentiality and data protection

We respect the confidentiality of all confidential information regarding the Company's business activities. Confidential information is defined as all non-public economic, technical or business information including, but not limited to, administrative processes and procedures, organisational matters, know-how, business and financial plans, costs, tender data and other relevant procedures, employees, customers and suppliers. At the same time, we must respect the confidentiality of all employees' personal data and the data and information entrusted to us by third parties.

The use or publication of such information is prohibited unless there is written approval from the CEO or a legal obligation to do so. Confidential information is disclosed only if required by law or approved for business reasons. In all such cases, we inform the CEO in writing in order to obtain approval for publication. Any legal or natural person outside the Company who receives such information must sign a confidentiality agreement (where legally possible).

When using information systems, we must pay particular attention to confidentiality issues in terms of data protection and security, while unauthorised access or manipulation by use of any technical means available is prohibited.

6.2 Assets of the Company

We manage the Company's assets and resources responsibly and use them appropriately and only for the intended business purposes. Assets include both tangible assets (premises, machinery and other equipment, computer hardware and software, furniture, etc.) and intangible assets (trade secrets, patents, trademarks, intellectual property, information, etc.), as



well as assets of third parties. In addition, lists of customers, subcontractors or suppliers, information in connection with contracts, technical or commercial practices, technical offers in the context of tenders or studies and, in general, all those data and information to which we have access in the performance of our duties, constitute assets of our Company. Our obligation to protect these intangible assets remains even after we leave the Company.

We do not appropriate the assets of the Company for personal benefit and use and do not dispose of them to third parties outside the Company.

Telecommunication systems and internal networks are assets of the Company and must be used exclusively for the performance of our work. The use of these systems for illegal purposes, such as the transmission of racist, sexual or harassing messages, is prohibited. We must keep the relevant passwords safe and refrain from any illegal reproduction of copies of the software used by our Company and from the illegal use of such software.

We pay particular attention to avoiding losses, damages, unnecessary expenses or misuse of the Company's assets.

6.3 Financial and non-financial reporting

We are committed to the accuracy of the financial reports and to the correct and accurate disclosure of the Company's financial information.

All financial transactions of the Company are always recorded and published in accordance with generally accepted accounting standards and principles, and the accounting records present the nature of the transactions in a correct, documented and not misleading manner. We provide timely, truthful information that is transparent, relevant, comprehensive, objective and correct.

We also believe that non-financial reporting is a critical tool for dialogue and stakeholder engagement and we are committed to submitting reports regularly on our non-financial performance, following international standards and best practices, to ensure transparency and build trust with all stakeholders.

7. Healthy competition

We are committed to ensuring that all our activities are conducted within a framework of healthy and fair competition and in strict compliance with all applicable laws in the countries where we operate. The Company is obliged to refrain from acts of unfair competition.

Practices that constitute unfair competition expose the Company to significant financial sanctions and damage its reputation, which may have serious consequences.

We must refrain from any conduct that could be construed as unfair competition under the relevant legislation. A proven violation of the relevant legislation may result in civil and criminal



liability in accordance with the applicable legislation and termination of the employment relationship with the Company.

In any case of doubt regarding the legality of any communication, contract, commercial practice or activity, we consult the Company's legal representatives.

8. Environmental Policy

We are committed to improving our environmental practices through precautionary measures and the use of environmentally friendly technology. We regularly assess our impact on the environment. By systematically identifying and leveraging potential green initiatives, we strive to support continuous improvements in our environmental performance and increase our resource efficiency. This includes frequent environmental controls and risk management.

We aim to minimise the negative impact of our activities on the environment. In this context, we follow the principle of prevention of environmental challenges and give priority to the development of Environmental Management Systems.

9. Reports of violations of the Code

If we find any violations of this Code, internal regulations or provisions, we must report them by submitting a named or anonymous report. We are also required to report any incident that may become a threat to human life, safety, security, the environment and the Company's assets. We encourage the submission of named reports as these are more easily investigated. In any case, we may seek clarification or advice on issues related to the Code of Conduct as well as ethical and regulatory compliance issues from the Head of the Human Resources Division, who is designated as the Reporting Officer for the matters provided for by this Code (Mr. Thanos Lignos, Tel: 2111802559 and email address : lignos@atticadps.gr)

In addition, we can send queries or report incidents via the following email address whistleblowing@atticadps.gr, which will be addressed exclusively to the Reporting Officer (Head of Human Resources Division).

Without prejudice to the provisions set out in the Company's "Whistleblowing Policy", as it is in force from time to time and communicated through the Company's website to all stakeholders, we are obliged to report any serious irregularities, omissions or criminal acts that came to our attention concerning employees or external personnel of our Company.

Our basic and inviolable principle is to protect the anonymity and confidentiality of the details of individuals who submit such reports, and to protect them against unfavourable treatment.

We take all necessary measures to maintain the confidentiality of the identity of the individual and the information he or she has submitted, disclosing it only where required by applicable law



or where such disclosure is unavoidable in order to conduct an effective investigation and take appropriate action.

The reports submitted may include, by way of example, incidents of:

- ✓ Theft,
- ✓ Misappropriation,
- ✓ Fraud,
- ✓ Threat,
- ✓ Extortion,
- ✓ Counterfeiting,
- ✓ Use of forged document,
- ✓ Corruption,
- ✓ Bribery,
- ✓ Misappropriation of assets,
- ✓ Abuse of power,
- ✓ Misleading presentation of data,
- ✓ Breach of confidentiality,
- ✓ Violation of the Company's policies,
- ✓ Violation of the legal framework governing the Company,
- ✓ Unethical behaviour,
- ✓ Insulting,
- ✓ Defamation etc.

10. Validity of the Code

This Code is binding on all of us, regardless of the time of our employment or the start of our cooperation with the Company. If, in the course of our duties, we deal with suppliers and customers, we must bring the Code to their attention and indicate their compliance with its rules, if required.

The Code of Conduct has been approved and validated by the Board of Directors of the Company and can only be amended or cancelled by the Board of Directors. Any amendments or cancellations will be notified accordingly and the current Code will be posted on the Company's website.

This Code shall enter into force immediately after its posting on the Company's website.