



SARACAKIS
GROUP OF
COMPANIES

In Motion for Over a Century

Saracakis Group of Companies



// CODE OF CONDUCT Values, Policies and Guidelines

2023

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1. Message from the Managing Director

Constant respect for our Group's Values and Vision is absolutely essential for the seamless and sustainable operation of our organisation. The ever-changing environment in which we have to operate, making the right decisions and acting in accordance with the Group's principles, is both a challenge and a commitment for all of us. This Code of Conduct is intended to provide guidance and information on our Group's policies and procedures, but more importantly on our spirit of business ethics. We rely on our operating procedures to compete ethically and fairly under any circumstances. I invite you all to embrace these standards so that we can preserve trust and respect, which are necessary for the success and sustainability of our Group.

2. Responsibility and Breaches

Responsibility to Notify and Abide With the Code of Conduct

The Saracakis Group of Companies is committed to applying fair practices in the conduct of its business. This commitment to integrity requires each one of us to act ethically. Each one of us, on behalf of our Group, is expected to act with honesty and integrity at all times and under any circumstances and to behave in a manner that protects and strengthens the reputation of our Group.

All employees are required to be aware of, and comply with, our Group's ethics and policies, which renders them responsible for complying with all legal requirements related to their work.

Duty to Report Breaches

Please remember that breaches of law can expose our Group, even the offender personally, to the risk of fines, penalties and, in some cases, imprisonment. Moreover, breaches can tarnish the reputation of our Group. Anyone who breaks the law may be subject to disciplinary action, including dismissal from the company.

If you become aware of any actual or suspected breach of Group policy or of legal requirements related to the Group's business activity, you must report it immediately to the Report Receiving and Follow-up Officer (RRFO), Ms. Vasiliki Damilakou, using one of the following methods:

1. By email to Vasiliki.Damilakou@saracakis.gr
2. By phone, calling landline +30 210 34 83 387 (ext. 1387) or mobile +30 6956 662 356
3. In person, at her office on the 2nd floor of our main building at 71 Athinon Ave.
4. Anonymously, using the following email addresses:
 - For the company 'Saracakis Brothers A.E.B.M.E.':
<https://report.whistleb.com/en/sgcgreece>
 - For other Group companies: <https://report.whistleb.com/en/sgcgroup>

You may also contact someone else (an intermediary) if you feel more comfortable doing so, provided that he/she knows how to contact the RRFO confidentially.

For example, you may contact the following persons:

- the Human Resources Manager
- the Legal Department Manager
- the Corporate Affairs and Communications Manager





- the Management Secretariat departments

Please rest assured that all reports are handled confidentially, and we encourage you to let us know of any irregularity that comes to your attention, thus helping us fix it.

3. Compliance

Our philosophy

The Saracakis Group of Companies operates in accordance with the legal, regulatory, corporate and ethical requirements of society in the countries in which it operates. We comply with all laws and regulations of the countries in which we operate and we require our employees, customers, suppliers and all interested parties with whom we do business to do the very same thing.

To ensure compliance:

1. We employ legal consultants to monitor legal developments concerning the Group.
2. We have appointed a Data Protection Officer (DPO) who is informed and trained and provides guidance on the implementation of the General Data Protection Regulation (GDPR).
3. We have appointed a Tax Compliance Monitoring Officer, to monitor and provide guidance on the implementation of tax legislation affecting the Group.
4. We have appointed a Report/Complaint Receiving and Follow-up Officer, as required by European Directive (EU) 2019/1937.
5. The Internal Audit Department annually prepares the audit programme after interviewing senior executives, which is then approved by the Managing Director. The purpose of the audit programme is to identify and assess risks, based on probability and impact. Risks are identified and assessed at least annually, as well as on an as-needed basis.

4. Our Vision and Values

Our Vision

We realise our vision by making the improvement of our customers' daily lives our top priority. We provide innovative products and pioneering services that add value to the communities in which we operate. Thanks to our flexibility, we can and do adapt our resources and priorities in search of opportunities to create value. We are committed to providing solutions and customised experiences, also making sure that we operate in a sustainable manner.

Our Values

1. Reliability, Integrity

With respect to the history of our Group, we always act with integrity. We only make promises that we are able to keep.

2. Open Communication, Sincerity, Authenticity

We communicate openly, with sincerity, transparency and authenticity. Our business objectives and financial results are communicated to all Group employees.





3. Sound Growth, Excellence, Unity, Team Spirit

We aim to ensure sound growth and high performance, while striving to constantly evolve, innovate and improve. We all work together towards a common objective, sharing the same goals and adopting a result-based mindset in everything we do. We become stronger by working together, as a team.

4. Our People are our Priority

Our people are at the heart of our work. We care about each other, our main priority being to build a culture of constant learning that will help our organisation progress. We invest in the personal and professional development of our people, providing them with strong incentives, promoting fair treatment of all and continuous training, and rewarding them for their initiatives and efforts.

5. Customer-Oriented Approach

Our desire is to keep our customers happy. We listen to and understand their needs. We offer innovative solutions, high-quality service and overall an exceptional experience, thus allowing them to have peace of mind.

6. Spirit of Cooperation and Conclusion of Agreements

We are devoted to the communities in which we operate and value partnerships that last over time. We represent our brands with professionalism and enthusiasm, with respect for the values that set them apart for mutual benefit.

7. Committed to being useful

We are committed to serving the communities in which we live by adopting appropriate corporate governance practices intended to protect the environment and improve the lives of our people and the broader community.

5. Fighting Corruption and Bribery

The Saracakis Group of Companies adopts a zero-tolerance approach to corruption and bribery in order to gradually reach a point where these problems are sufficiently contained.

Corruption is generally defined as financial or other favours to the person directly concerned or members of his/her family, which are capable of influencing a party to a transaction, in order to obtain an advantage which does not arise normally from the typical commercial practices of the Group.

When it comes to bribery, this is the one simple rule to follow: Do not bribe anyone, at any time and for any reason.

More specifically, the Group's anti-bribery policy refers to the following cases:

- Government bribery or bribery to public officials
- Commercial bribery, i.e. bribery to any natural or legal person
- Passive bribery, i.e. when a person accepts a bribe

The means of corruption and bribery may take many forms besides money. For example:

- Gifts
- Accommodation expenses
- Discounts





- Investment opportunities
- Jobs
- Confidential information
- Electoral bribery

Accepting Gifts

Overview

Each of us is expected to act in a manner that promotes the best interests of the Group. Personal relationships with suppliers, partners and customers should not interfere with our ability to act in the best interests of the Group. These relationships must not tarnish the reputation of our Group by raising suspicion of improper conduct. If you are in doubt about an action, please ask yourself how a third person would view your actions if they were reported to Management or to the media. Accepting gifts or favours from a business acquaintance could affect your ability to make decisions on behalf of the Group, or could be interpreted as conduct through which that business acquaintance seeks preferential treatment.

Guidelines

- Do not solicit a gift or favour from a person or organisation that has, or is actively seeking or is likely to establish, a business relationship with the Group.
- You may accept a gift or favour offered free of charge by a business acquaintance only if its value is symbolic, it is part of a sales promotion, advertising or publicity action, and is offered for a legitimate commercial purpose. For example, a gift of up to €50 is considered to be of symbolic value.
- Never accept any of the following types of gifts or favours:
 - Cash and loans
 - Discounts on products or services, unless the supplier makes them generally available to all Group employees
 - Gift vouchers, as they are deemed to be equivalent to cash
- You must return inappropriate gifts with due courtesy, explaining our Group's policy. If it is practically impossible to return a gift or you are not sure whether it is appropriate, please consult one of the following:
 - your supervisor or manager
 - the Human Resources Department
 - the Internal Audit Department
 - the Report Receiving and Follow-up Officer, as per paragraph 2.

Offering Gifts

Overview

Just like accepting gifts, offering gifts can damage the Group's reputation by raising suspicion of improper conduct. In order to avoid offering gifts or favours to those who have, or aim to establish, a business relationship with the Group, you should first ask yourself whether the gift is part of a typical and approved promotional or advertising action and whether it is of small value.

Guidelines

- You should avoid situations that may raise suspicion of improper conduct.





- If you are not sure whether something you intend to offer is appropriate, please consult any of the following:
 - your supervisor or manager
 - the Human Resources Department
 - the Internal Audit Department
 - the Report Receiving and Follow-up Officer, as per paragraph 2.

6. Working Environment

Basic Working Conditions

Overview

The Saracakis Group of Companies is based on the knowledge, capabilities and personal efforts of its employees, regardless of position. The Group has managed to become a leading actor in an ever-changing competitive market environment due to the dedication and team spirit of its employees. It aims to attract, develop and retain multi-skilled persons by investing in their professional development and rewarding their performance.

We expect our people to adopt the understanding that harmonious cooperation and commitment to a common goal are key factors for the Group's success. The Group expects its people to demonstrate professionalism, a people-oriented approach, patience and perseverance, interest in constant development, dynamism, flexibility and team spirit, with a view to attaining the goal of offering high quality services to customers and ensuring its success in the sectors in which it operates.

Last but not least, the Group declares its commitment against child and forced labour, also promising to help fight such practices no matter where they come from.

Main objectives

- Provision of competitive pay and working hours, in compliance with applicable legislation
- Provision of equal opportunities
- Respect for diversity, including different ideas, perceptions and beliefs, and utilisation of all those elements for the benefit of the Group
- Commitment to promoting and implementing inclusion across the whole range of the organisation's operations

Fighting Harassment

Overview

It is a prerequisite for us not to tolerate harassment or any discrimination in our workplace, in order to provide a work environment where respect and a sense that we all belong to the same company prevails. Harassment includes verbal or other behaviour that may be degrading, intimidating or offensive to others. Discrimination is based on disability, race, religious belief, gender, age and appearance. All of us, including our suppliers or other visitors to our premises, are protected against such behaviour, and we expect them to comply accordingly. Breaching that policy will result in disciplinary action, including dismissal from the company.

Guidelines

- Learn about our Group's Policy Against Violence and Harassment. The Policy is posted on the Group's intranet: HR Policies > HR > POLICY AGAINST VIOLENCE AND HARASSMENT AT WORK.
- Do not make jokes, use language, or participate in actions that may offend others.





- Do not bully others by using pressure, threats or jokes against them.
- Discourage others from displaying such behaviour.
- Take all complaints of harassment seriously. Managers and supervisors should encourage a working environment where all feel free to report possible breaches.

Health and Safety

Overview

Our Group is committed to offering reliable and high quality products and services, with respect for the environment and occupational safety and health (OSH), living up to customer demands and expectations and taking into account any legislative and regulatory requirements.

In implementing its Quality, Environment and Occupational Safety & Health Policy (Policy), the Group has developed, installed and implemented a comprehensive Quality, Environment and Occupational Safety & Health Management System (MS)., which is based on and operates in accordance with the following principles:

Principles

- Planning and implementation of all actions that may affect quality and the environment in accordance with established MS procedures and other documentation.
- Systematic identification, assessment and control/management of all environmental issues and impacts resulting from our Group's activities.
- Systematic identification, assessment and control/management of all OSH-related risks, minimising these risks and adopting safe methods and operating procedures to avoid accidents and occupational diseases, both during daily/normal activity and in case of emergency.
- Systematic identification, assessment and management of all opportunities related to quality, the environment and OSH.
- Ongoing effort to avoid environmental pollution that may occur during performance of our work.
- Ongoing effort to minimise the amount of waste eventually generated, by applying best available recovery, reuse and recycling techniques wherever possible.
- Safe management of any hazardous waste that may be generated during the Group's processes.
- Effort to continuously reduce the consumption of natural resources and energy.
- Communication of this Policy to our suppliers and making sure that they comply with it.
- Establishment and maintenance of an open and creative trusting relationship with the local community and the public.
- During scheduled Management review of the MS, quality, environment and OSH objectives are reviewed as part of our ongoing effort to improve the quality of our products and services, to ensure environmental protection, OSH and customer satisfaction, and to streamline our overall Management System (MS).
- All employees are fully informed of, and actively involved in, the implemented MS and are aware of their responsibilities and duties under such implementation. They also recognise that





cooperation and communication between Management and staff leads to Policy improvements, as active staff participation in the formulation of proposals for improvement is encouraged in every way.

In order to achieve the above, our Company:

- Provides all necessary means (materials, equipment, infrastructure, human resources and training) to meet the Quality, Environment and OSH objectives.
- It has appointed a Management System Officer (MSO), who has the authority and organisational independence required to ensure that the Group's MS functions and complies with the following ISO 9001 standards: 2015, ISO 14001: 2015, BS -OHASS 18001: 2007 and ISO 45001: 2018.

7. Conflict of Interests, Entertainment and Lunches

Conflict of Interest

Overview

Each one of us is expected to behave in a manner that protects the interests and reputation of our Group. It is our desire that all have friendly relationships with suppliers, partners and other business acquaintances. However, it is important to avoid conflicts of interest and circumstances that raise suspicion of improper conduct. If you find yourself in a work situation that may create a conflict of interest, discuss it with your supervisor or manager. It is also important to understand that a conflict of interests may concern you, your family members, or your friends.

Guidelines

- Do not make any personal investment in companies that are our competitors or business partners if the investment may cause you to take action that could harm the Group.
- Certain relationships within the Group may jeopardise your ability to perform your job duties or may create uncomfortable or conflicting situations, and may raise issues of fair or preferential treatment. Thus, family, romantic or physical relationships within the Group or between one of us and a business acquaintance should be avoided.

Entertainment and Lunches

Overview

Social interaction with suppliers, partners and other business acquaintances can help foster a good business relationship, but there are limitations on the types of entertainment and social events that are acceptable. You must always remember to act in a way that promotes the best interests of our Group, and protects its reputation. Social interactions with professional acquaintances should be appropriate and limited. You should only accept invitations related to your business activity. You should never accept an invitation that could raise suspicion of improper conduct. Although you may accept invitations from business acquaintances, please remember that frequent acceptance of gifts or invitations (even if within limits) may raise suspicion of improper conduct.

Guidelines

- You may accept a gift while you are at an event where your attendance has been paid for, provided that the gift is of symbolic value. For example, a gift of up to €50 is considered to be of symbolic value.





- Use your judgment when offered gifts or invitations. If you are not sure whether something offered to you is appropriate, please consult any of the following:
 - your supervisor or manager
 - the Human Resources Department
 - the Internal Audit Department

8. Confidentiality and Use of Assets

Information Security

Overview

Information and information processing systems are important assets of our Group. Maintaining and/or enhancing the Group's market share and overall reputation are directly dependent on information and information systems. The more comprehensive information security topics presented here were developed to protect information in general, but also to safeguard three basic and well-established principles:

1. availability,
2. integrity, and
3. confidentiality.

Each one of us must protect these assets, prevent unwanted access to information and ensure the integrity and confidentiality of assets. We are all responsible for the protection of information and for the Group's business continuity. Constant technological development has created new realities and offers expanded markets and flexibility. The prevalence of the Internet and the spread of e-commerce have created new risks. The expansion of computer networks offers flexibility to people of low morality and dignity who may cause damage to the Group. Therefore, extra effort and constant perseverance on the part of our employees with a view to protecting information are important factors for success.

Guidelines

- Whenever you suspect that the security of our Group's information has been compromised, please do not hesitate to notify us immediately as per paragraph 2.
- Each one of us must report immediately any loss of confidential, sensitive or personal information, as well as even the slightest suspicion of disclosure of that information to unauthorised third parties.

Clean Desk

Overview

Sensitive or confidential data and information should not be exposed in the workplace when the employee working at the desk is absent. This guideline includes data in electronic format (e.g. USB storage media, CDs, etc.) or data recorded in any other way (printouts, handwritten notes, photographs, etc.). Following are some indicative guidelines:





Guidelines

- Sensitive or confidential information must be stored in a secure place when the employee working at the desk is absent. That information must be kept in drawers or lockers, which must be secured. If your drawers and lockers do not have locks, please tell your supervisor or manager.
- Sensitive or confidential information that is no longer needed should be destroyed using available document shredders. You must always make sure that you have not left any documents on printers or fax machines.
- You must always secure your monitor, desktop computer or laptop when you are away.
- At the end of your work, you must disconnect from all systems which you may be connected to and switch off your monitor, laptop or desktop computer.
- You must always store securely any folders with printouts, USB storage media, CDs or other media that may contain sensitive or confidential data and information.

Use of Assets

Overview

Each one of us is responsible for protecting the Group's assets and making sure that they are used for business purposes and in accordance with applicable policies.

All electronic data stored on computers or similar media are Group property. The Group has the right to monitor or access documents on its systems at any time, within the limits of applicable laws and agreements.

If you drive a company vehicle, you must have an appropriate licence and drive the vehicle safely and in accordance with the law.

Guidelines

- Use your laptops for business purposes.
- Do not leave your laptops exposed to the public or in a non-secure area.
- Always back up your laptop data and keep the backup files in a secure place.
- Update your laptop with the latest antivirus software.
- When travelling, carry your laptop as hand luggage.
- Drive safely and in accordance with the law.
- Any loss or suspected loss of other items belonging to the Group (e.g. access cards, company credit cards, company mobile phones, etc.) must be reported immediately to the Human Resources Department.

9. Sustainable Development

Corporate Social Responsibility

One of the underlying values of the Saracakis Group of Companies is our commitment to be useful and beneficial. The new global challenges of climate change, social problems, and safety and health issues require businesses to operate in a responsible way, aiming not only for financial





performance and profitability but also for actions that put people and the environment at the heart of everything they do.

Development of a Sustainable Society

In view of the above, we, at the Saracakis Group of Companies, have incorporated the concept of social mission in our corporate culture. Through specific corporate responsibility actions and through the practices we adopt in the way we operate as an organisation, we place emphasis on new emerging values, such as safeguarding public health, the environment, circular economy, responsible investment, social solidarity, human rights, business ethics and transparency.

We are committed to developing a sustainable society in any way possible and ensuring a sustainable future. Through the way we operate, we seek to serve people and the communities in which we live by adopting environmental, social and corporate governance practices.

Quality, Environment and Occupational Safety & Health Policy

Company Management and all staff are committed to providing reliable and high quality products and services, with full respect for the environment and occupational safety and health (OSH), always living up fully to the demands and expectations of our customers, also complying with any relevant legislative and regulatory requirements.

Quality, Environment and Occupational Safety & Health Management System

In implementing its Quality, Environment and Occupational Safety & Health Policy (QEOSH or Policy), the Company has developed, installed and implemented an integrated Quality, Environment and Occupational Safety & Health Management System (MS or Management System), which is based on and operates in accordance with the following principles:

- All actions that may affect quality and the environment are planned and implemented in accordance with established MS procedures and other documentation. Systematic identification, assessment and control/management of all environmental issues and impacts resulting from the company's operation.
- Systematic identification, assessment and control/management of all OSH risks, minimising these risks and adopting safe methods and operating procedures to prevent accidents and occupational diseases, both during typical works and in case of emergency.
- Systematic identification, assessment and management of all opportunities related to quality, the environment and OSH.
- Ongoing effort to prevent pollution that may occur during performance of works.
- Ongoing effort to minimise the quantities of waste eventually generated, by applying best available techniques, as well as recovery, reuse and recycling techniques wherever possible.
- Safe management of any hazardous waste occurring during the Company's processes.
- Effort to constantly reduce the consumption of natural resources and energy.
- Communication of this Policy to suppliers doing business with the company and making sure that they comply with the relevant principles.
- Establishment and maintenance of an open and creative trusting relationship with the local community and the general public.





- Establishment and ongoing review of quality, environment and OSH targets and objectives during Management review of the MS, in the context of a continuous effort to improve the quality of products, services, environmental and OSH performance, the level of customer satisfaction and the MS as a whole.
- All employees are fully aware of, and actively engaged in, the implemented System and the responsibilities and tasks resulting for each one of them, as it is recognised that quality, environment and OSH improvements can be obtained from cooperation and communication between Management and staff at all levels; therefore active staff participation in the formulation of proposals for improvement is encouraged in every way.

To implement the above, the Company

- Provides all necessary means (materials, equipment, infrastructure, human resources and training) to attain the Quality, Environment and OSH objectives.
- It has appointed a Management System Officer (MSO), who has the authority and organisational independence required to ensure that the MS applied by the company functions and complies with the ISO 9001:2015, ISO 14001:2015, BS-OHSAS 18001:2007 and ISO 45001:2018 standards.

11. DP13.1-E10 ISO 14001 CERTIFICATE 21-02-14 GR 2015

11. DP13.1-E10 ISO 9001 CERTIFICATE 21-02-14 GR 2015

11.-DP13.1-E10 ISO 45001 CERTIFICATE

In addition to being communicated to all employees within Company premises, this Company Policy is also available to the general public and all interested parties, as it is posted on the Company's website and is reviewed for appropriateness at regular intervals (at least annually, when Management reviews the Management System).

All of us, employees, Management and staff, are committed to carrying out our tasks, duties and obligations always complying with the integrated Management System.

Environment

The new global challenges of climate change and safety and health require businesses to operate in a responsible way, aiming not only for financial performance but also for actions that put people and the environment at the heart of everything they do.

In this way, we also contribute practically to protecting the environment and our natural resources by systematically investing in the improvement of our environmental footprint.

Our initiatives and actions in this direction reflect our commitment to sustainable development and circular economy principles. We consistently take action and pave the way towards a green culture and the adoption of environmental awareness.

Environmental Management

We, at Saracakis Group of Companies, operate in a sustainable manner that ensures environmental protection by complying with relevant legislative and regulatory directives.

We have developed and installed an integrated Quality, Environment and Occupational Safety & Health Management System in accordance with the ISO 9001, 14001 and 45001 standards, which is faithfully implemented by all our employees who have received the necessary training.





We are a member of the Hellenic Recovery Recycling Corporation and are registered in the National Register of Waste Producers.

We place emphasis on minimising the quantities of waste eventually generated, by applying best available recovery, reuse and recycling techniques in our Athens and Thessaloniki facilities.

Every day, dozens of tons of plastic, cardboard, iron and wood packages, electrical batteries and accumulators, electrical and electronic equipment, lubricating oils, spare parts and vehicle and machinery tyres are sorted and recycled.

Corporate Social Responsibility Actions

Our actions are ongoing and are presented in detail on our website: <https://www.saracakis.gr/etairiki-koinoniki-efthyni/>

10. Competition and International Trade

Fair Competition

Overview

The Group supports free trade and fair competition in the market. It implements ambitious sales strategies to satisfy its customers and seeks to do business in compliance with the laws of competition.

Our ideas

- We build relationships of mutual trust with our partners, which foster mutual growth and support with a view to fair competition.
- Our 'Customer is our Priority' philosophy leads to the creation of a sales and service structure that responds quickly to the diverse needs of our customers.
- Our Procurement Department evaluates prospective suppliers based on their strengths, including quality, technology, price, quantity and reliable delivery, as well as on the stability of their business management and their technological development capabilities.

Guidelines

- Do not share competitive and sensitive information (e.g. prices, costs, distribution, etc.) with competitors.
- Do not make business deals for the sole purpose of harming a competitor.
- Do not agree with competitors to undermine a supplier or customer.
- Do not agree on prices with suppliers while evaluating potential suppliers.

Prohibited Transactions

Overview

The European Union has adopted legislation that restricts exports and transactions with certain countries, entities and persons. These trade restrictions limit or prohibit transactions with certain persons and entities as well as with certain sanctioned countries, which currently include Iran and North Korea. To avoid the risk of engaging in prohibited transactions, when considering each





business activity one must first determine whether the transaction pursued is appropriate (please see guidelines below). Breaching these regulations can damage the reputation of our Group and result in high fines and penalties for the Group and the individuals involved. We, as a Group, must comply with these trade restrictions.

Guidelines

- Always consult the updated map of sanctioned countries: <https://www.sanctionsmap.eu/#/main>
- Make sure you are not exporting to a prohibited destination.
- Make sure you have done professional research to find out whether a transaction is prohibited.
- If, after following the above procedure, you find out that a transaction should be rejected or not proceed, you should report it directly to the RRFO, as per paragraph 2.

Money Laundering

Overview

Everyone must follow the policies and procedures established to avoid involvement in any money laundering scheme and to ensure that our Group complies with the regulatory framework in force. Money laundering refers to transactions carried out by criminals, terrorists or others to conceal the illegal origin of their funds. This process involves transactions which, when completed, appear to be legitimate. Just one person in the Group taking action to assist with money laundering, even if acting on his/her own behalf, may result in a fine for the Group and damage to its reputation.

Guidelines

- Look for any suspicious transactions
- Any suspicious activity should be reported immediately to the RRFO, as per paragraph 2. Please rest assured that all reports are handled confidentially.

11. Fighting modern slavery and human trafficking

The Saracakis Group of Companies has adopted a zero-tolerance approach to modern slavery and human trafficking, in order to act ethically and with integrity in all our business transactions and relationships. We are committed to implementing adequate control systems to ensure that modern slavery does not take place anywhere in our Group or in any of our supply chains. In addition, we are committed to complying with the provisions of Law 4216/2013 and the relevant notification obligations that are in force.

Should you become aware or suspicious of any actions which are not in line with the Group's approach, you are under obligation to report it as described in paragraph 2.

Any employee or cooperating party that breaches this Policy will face disciplinary action, up to dismissal or termination without further notice.

We reserve the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

