

Saracakis Group of Companies



// CODE OF CONDUCT Values, policies and directives

Table of Contents

1.	Message from the Management	3
2.	Responsibility and Violations	3
	Responsibility to Be Informed and Follow our Code of Conduct	3
	Duty to Report any Violations	3
	Whistleblowing Mechanism	4
3.	Our Vision, Purpose and Values	4
	Our Vision and Purpose	4
	Our Values	4
4.	Workplace Environment	5
	Basic Working Conditions	5
	Anti – Harassment	6
	Health and Safety	6
5.	Gifts, Favors, Meals and Conflicts of Interest	7
	Receiving Gifts	7
	Offering Gifts	8
	Entertainment and Meals	9
	Conflicts of Interest	9
	Anti-Corruption	10
	Anti-Bribery	10
6.	Confidentiality and Use of Assets	10
	Information Security	10
	Clear Desk	11
	Use of Assets	11
7.	Sustainability	Error! Bookmark not defined.
	Policy on Quality, Environment, and Occupational Health & Safety	Error! Bookmark not defined.
	Environment	Error! Bookmark not defined.
	Corporate Governance	12
	Corporate Social Responsibility Actions	13
8.	Competition and International Trade	13
	Fair Market Competition	13
	Prohibited Transactions	13
	Money Laundering	14



1. Message from the Management

The on-going respect of the Values and Vision of our Group is absolutely necessary. The ever-changing environment in which we need to operate, making the right decision and acting in accordance with the Group's beliefs, can be challenging. This code of conduct intends to provide guidance and information relating to our Group's policies and procedures but primarily to its business ethics and spirit. It is based on our operating practices so that we can compete ethically and fairly under any circumstances. I urge all personnel to adhere to these standards. In this way, you will help us maintain the trust and respect that are essential for our Group's future success.

2. Responsibility and Violations

Responsibility to Be Informed and Follow our Code of Conduct

Saracakis Group of Companies is committed to fair business. This commitment to integrity requires each of us to act ethically. Each of us, on behalf of our Group, is expected to act with integrity, always and under any circumstances. We are expected to perform in a manner that protects and enhances our Group's reputation.

All employees must know and comply with the ethics and policies of our Group, and they are responsible to follow all legal requirements related to their work. In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

Duty to Report any Violations

Please keep in mind that violations of the law can expose our Group, and even the individual violator, to fines, penalties, and, in some cases, imprisonment. Additionally, violations could damage our Group's reputation. Anyone who violates the law may be subject to disciplinary action including release.

If you become aware of a known or suspected violation of a Group's policy or business-related legal requirements, you should report it promptly to one of the following:

- Your Manager
- Your Director
- Group Human Resources Director
- Legal Manager
- Internal Audit department
- Executive Assistants

Rest assured that all reports are treated confidentially.

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.



Whistleblowing Mechanism

The Company has established a Whistleblowing Mechanism for reporting breaches, cooperating with an external independent partner, ensuring the impartiality and integrity of the process. The mechanism is fully compliant with Law 4990/2022 and Directive (EU) 2019/1937, providing secure reporting channels, guaranteeing confidentiality, protection of personal data, and protection of reporting persons against retaliation, with the option to submit reports either anonymously or by name.

Employees and other interested parties may submit reports through the following channels:

- Electronic Reporting Platform
- [AS](#)
- [Apollon / Enser / Sigma Romania/Sigma Bulgaria](#)
- Email
- Telephone hotline
- Postal mail
- In-person meeting with the Whistleblowing Officer-Reporting Receipt and Follow-up Officer (R.R.F.O.)

3. Our Vision, Purpose and Values

Our Vision

We turn our visions into reality setting as our top priority the betterment of our customers' daily lives. We provide innovative products and pioneering services with added value to our communities. As an agile organization, we can quickly redirect our resources and priorities toward value-creating opportunities. We pledge to create solutions by offering personalized experiences whilst we are committed to operating in a sustainable way.

Our Purpose

We Empower Trust and Growth through Sustainable, Impactful and Human-Centered Solutions for All.

Our Values

1. Trustworthiness – Integrity

We always act with integrity respecting our Group's heritage. We only make promises that can be kept and we deliver them.

2. Open Communication – Honesty – Authenticity

We communicate in an authentic, open, honest, and transparent way. Our business targets and results are conveyed to all Group associates.

3. Healthy Growth – Excellence - Togetherness – TeamWork



We pursue healthy growth and excellence striving for continuous evolution, innovation, and improvement. We work together towards a common purpose and shared goals adopting a results-oriented mentality. Togetherness and teamwork make us stronger.

4. Our People First

We put our people at the core. We care for each other whilst our top priority is to build a learning culture that drives our business forward. Investing in our people's constant personal and professional development we provide strong motivation, we promote fairness, continuous training and we reward their initiatives and efforts.

5. Customer Centricity

We want to keep our customers happy. We listen and understand our customers' needs. We provide pioneering solutions that will give them peace of mind and overall an exceptional, high-quality customer experience.

6. Collaboration and Partnership

We are committed to our communities as we value long-term partnerships. We represent our brands with professionalism and enthusiasm, while respecting their values to our mutual benefit.

7. Pledge to Do Good

We pledge to serve the communities we live in by adopting environmental, social, and corporate governance practices.

4. Workplace Environment

Basic Working Conditions

Overview

Saracakis Group of Companies relies on the knowledge, capabilities and the personal efforts of its personnel regardless of their position. The leading position of the Group in the constant changing competitive environment of the automotive market is a result of loyalty and teamwork of its staff. Its goal is to attract, develop and retain skillful staff investing in their professional development and rewarding their performance.

The personnel are expected to adopt the belief that smooth cooperation and commitment towards a common goal constitute basic factors for the success of the Group. The Group expects its people to exhibit professionalism, a customer-centered approach, patience and persistence, interest for continuous advancement, dynamism, flexibility and team spirit, in order to achieve the goal of top level customer services and secure its successful course in the automotive market.

Last but not least, our Group declares against child labour and forced labour.



Key objectives

- Providing competitive compensation and work hours, in compliance with the law
- Providing equal opportunities
- Respecting different ideas, perspectives, and beliefs

Anti – Harassment

Overview

A workplace that does not tolerate harassment or discrimination is a prerequisite to our having a respectful and inclusive work environment for which we are committed. Harassment includes language or conduct that may be derogatory, intimidating, or offensive to others. Discrimination includes disability, race, religious beliefs, sex, age and appearance. All of us, as well as vendors and other visitors to our premises, are protected and they are expected to comply with this. Violations will result in disciplinary actions including release.

Instructions

- Do not make jokes, use language, or participate in activities that may be offensive to others.
- Do not intimidate others through bullying, threats, or practical jokes.
- Discourage others from engaging in such behavior.
- Take all harassment complaints seriously. Managers and supervisors should encourage a working environment in which everyone feels free to report potential violations.

Health and Safety

Overview

Our Group is committed to providing reliable and high-quality products and services, with respect to the Environment, Health and Safety at Work (HSW), while meeting the requirements and expectations of our customers, including any relevant Legislative and Regulatory requirements.

In the context of implementing the Policy of Quality, Environment and Health and Safety at Work (Policy), our Group has developed, installed and implements an integrated Quality, Environment, Health and Safety at Work Management System (MS), which is based on and operates in accordance with the following principles:

Principles

- All actions that may affect the quality and the environment are planned and implemented in accordance with the established Procedures and the other documentation of the MS.
- The systematic recognition, evaluation and control / management of all environmental aspects and effects from the operations of our Group.



- The systematic recognition, evaluation and control / management of all risks regarding HSW, by minimizing these risks and adopting safe methods and operating procedures for the prevention of accidents and occupational diseases, both for normal/daily operations and for emergencies.
- The systematic recognition, evaluation and management of all opportunities concerning quality, environment and HSW.
- The continuous effort to prevent environmental pollution that may occur during the execution of our work.
- The continuous effort to minimize the quantities of waste finally generated, by applying the best available recovery, reuse and recycling techniques, where possible.
- The safe management of any hazardous waste that may appear during our Group's processes.
- The effort to constantly reduce the consumption of natural resources and energy.
- Informing our suppliers about this Policy and ensuring their compliance.
- Creating and maintaining an open and creative relationship of trust with the local community and the public.
- During the established review of the MS by the Management, our quality, environmental and HSW goals and objectives are revised, as part of our continuous effort to improve the quality of our products, services, environmental and HSW performance, customer satisfaction and the Management System (MS) as a whole.
- All employees are fully informed, and they participate actively in our implemented MS. They are informed concerning their responsibilities and tasks that arise from this implementation. All employees recognise that cooperation and communication between the Management and staff at all levels lead to improvements in the Policy, as active participation of staff in the formulation of improvement proposals is encouraged in every way.

For the Accomplishment of the Above, our Group:

- provides all the necessary means (materials, equipment, infrastructure, human resources and training) to achieve the objectives of Quality, Environment and HSW.
- has appointed a Management System Supervisor (MSS), who has the required authority and organizational independence, to ensure that the Management System implemented by the Group, operates and complies with the standards ISO 9001: 2015, ISO 14001: 2015, BS -OHASS 18001: 2007 and ISO 45001: 2018.

5. Gifts, Favors, Meals and Conflicts of Interest

Receiving Gifts

Overview



Each of us is expected to act in a way that promotes our Group's best interests. Personal relationships with suppliers, dealers, and customers must not affect your ability to act in a manner that is best for our Group. Those relationships must not harm our Group's reputation by creating the suspicion of impropriety. Some advice could be to ask yourself how others might view your actions if they were reported to the Management or in the media. Accepting gifts or favours from a business contact could affect your judgment when making decisions on behalf of our Group, or it could be interpreted as a behaviour through which this business contact is seeking favourable treatment.

Instructions

- Do not ask for a gift or favor from an individual or organization that does business with our Group or is actively seeking to do business with our Group or is a potential business contact.
- Accept a gift or favor that is freely offered by a business contact only if its value is nominal, it involves a normal sales promotion, advertising, or publicity, and there is a legitimate business purpose. Indicatively, a gift valued up to the amount of €50 is considered of nominal value.
- Never accept any of the following types of gifts or favors:
 - Cash and loans
 - Discounts on goods or services, unless the supplier makes them generally available to all employees of our Group
 - Gift certificates (vouchers) as they are considered cash equivalents
- Inappropriate gifts should be returned politely explaining our Group's policy. If it is not practical to return the gift or you are not sure if it is inappropriate, please consult any of the following:
 - Your Manager or Director
 - Human Resources department
 - Internal Audit department

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

Offering Gifts

Overview

Same as receiving gifts, offering gifts may harm our Group's reputation by creating the suspicion of impropriety. In order to prevent offering inappropriate gifts or favours to those who do, or seek to do, business with our Group, you should firstly ask yourself if the gift is part of normal and approved sales promotions or advertising and if it is of limited value.

Instructions

- You should avoid situations that could create the suspicion of impropriety.
- If you are not sure if something you intend to offer is inappropriate, please consult any of the following:



- Your Manager or Director
- Human Resources department
- Internal Audit department

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

Entertainment and Meals

Overview

Socializing with suppliers, dealers, and other business contacts can be helpful in cultivating a good working relationship, but there are limitations on what types of entertainment and social events are acceptable. You must always remember to act in a way that promotes our Group's best interests, and that protects its reputation. Social activities with business contacts must be appropriate and limited. You should only accept invitations that are business-related. You should never accept an invitation that would create a suspicion of impropriety. Although you may accept invitations from business contacts, please keep in mind that frequent acceptance of gifts or invitations (even if within limitations) may create a suspicion of impropriety.

Instructions

- You may accept a gift while at a paid event, as long as the gift is of nominal value. Indicatively, a gift valued up to €50 is considered of nominal value
- Use good judgment when you are offered gifts or invitations. If you are not sure if something you are offered is inappropriate, please consult any of the following:
 - Your Manager or Director
 - Human Resources department
 - Internal Audit department

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

Conflicts of Interest

Overview

Each of us is expected to act in a manner that protects our Group's interests and reputation. It is desirable to have friendly relationships with suppliers, dealers, and other business contacts. Yet it is important to avoid conflicts of interest and circumstances that create the suspicion of impropriety. If you are in a business situation that may create a conflict of interest, review the situation with your Manager or Director. Finally, it is important to understand that conflicts of interest may concern yourself, your family members, or friends.

Instructions



- Do not make personal investments or engage in collaborations with companies that are competitors, suppliers, customers or business partners of our Group. The same applies to your relatives and social circle. In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.
- Certain relationships within our Group may compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness and favouritism. Thus, romantic, physical or familial relationships within our Group or between any of us and a business contact should be avoided.

Anti-Corruption

Saracakis Group of Companies adopts a strict zero-tolerance policy toward any form of corruption and is committed to operating with integrity, transparency, and honesty. Any act that could be considered, or could create the appearance of, corruption is strictly prohibited, including undue advantages, bribery, or any other unlawful or unethical practice.

Anti-Bribery

Bribery is prohibited in every kind of commercial transactions. The rule is one and simple to follow: Do not bribe anybody, anytime, for any reason.

6. Confidentiality and Use of Assets

Information Security

Overview

Information and systems used for processing, are important assets to our Group. Sustaining and/or expanding the market share and the general reputation of our Group depend directly on the information and the information systems. The most comprehensive information security issues presented here have been developed to protect information in general and to ensure the three basic and established principles:

1. Availability
2. Integrity
3. Confidentiality

Each of us must protect these assets, prevent any unwanted access to information and ensure the integrity and confidentiality of this information. We are all responsible for the protection of the information and for the going concern. The constant evolution of technology has created new realities and it offers wider 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 limited morals and dignity who could cause harm to our Group. Our employees' extra effort and constant perseverance in order to protect information is an important factor of success.

Instructions



- In any case you suspect that the Information Security of our Group has been violated, do not hesitate to immediately inform your Manager or Director as well as our Information Technology department.
- Each of us must immediately report any loss of confidential, sensitive or personal information, as well as the slightest suspicion of disclosure to unauthorized third parties.

Clear Desk

Overview

Sensitive or confidential data and information should not be exposed in the workplace when the office holder is absent. This directive includes data in electronic format (e.g. USB sticks, CDs, etc.) or data recorded in any other format (prints, handwritten notes, pictures, etc.). Below are some indicative instructions:

Instructions

- Sensitive or confidential information should be stored in a safe place when the office holder is absent. This information should be kept in the drawers or closets, which should be secured. If your drawers and closets do not have locks, please inform your Supervisor, Manager or Director.
- Sensitive or confidential information that is no longer needed should be destroyed in the available document shredders. You should always confirm that you have not left any documents on the printers and fax machines.
- Always secure your monitor, computer or laptop when you are away.
- At the end of your work you should disconnect from all the systems you may be connected to and turn off your monitor, computer or laptop.
- Always store securely any hardcopy folders, USB sticks, CDs or other media which may contain sensitive or confidential data and information.

Use of Assets

Overview

Each of us is responsible for protecting our Group's assets and ensuring that they are used for business purposes and in accordance with our policies.

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

If you drive a corporate vehicle, you are required to be properly licensed and to operate the vehicle safely and in accordance with the law.

Instructions



- Use your laptops for business purposes.
- Do not leave your laptops exposed to public or unsafe place.
- Always back up your laptop data and keep it in a safe place.
- Keep your laptop up to date with the latest antivirus software.
- When traveling, carry your laptop as hand luggage.
- Drive vehicles safely and in accordance with the law.
- Any loss or suspicion of loss of other items belonging to our Group (e.g. access cards, corporate credit cards, corporate mobile phones, etc.) should be reported directly to our Human Resources department.

7. Sustainability

One of the core values that guide the Saracakis Group of Companies is our commitment to being useful and beneficial.

The new global challenges—climate change, social issues, and health and safety concerns—require businesses to operate responsibly, aiming not only at financial performance and profitability but also at actions that place people and the environment at the center of everything they do.

More information here: [Sustainability Reports](#)

Policy on Quality, Environment, and Occupational Health & Safety

The Management and all employees of the Company are committed to providing reliable and high-quality products and services, with full respect for the Environment and Occupational Health and Safety (OHS), always fully meeting the requirements and expectations of our customers, including all relevant legal and regulatory requirements.

Environment

The new global challenges—climate change, health, and safety—require businesses to operate responsibly, aiming not only at financial performance but also at actions that place people and the environment at the center of everything they do.

Accordingly, we actively contribute to the protection of the Environment and our Natural Resources by systematically investing in improving our environmental footprint.

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

More information here: <https://www.saracakis.gr/en/environmental-management/>

Corporate Governance

Continuous respect for the Values and Vision of our Group is essential for the smooth and sustainable operation of our organization.



The constantly evolving environment in which we operate, requiring us to make the right decisions and act in line with the Group's principles, is both a challenge and a commitment for all of us.

More information here: <https://www.saracakis.gr/en/corporate-governance/>

Corporate Social Responsibility Actions

You can stay informed about all our initiatives here: <https://www.saracakis.gr/en/corporate-responsibility/>

8. Competition and International Trade

Fair Market Competition

Overview

Our Group respects free trade and market competition. It implements ambitious sales strategies in order to achieve customer satisfaction and seeks to engage in fair competition and transactions.

Our ideas

- We build relationships with dealers based on mutual trust, in order to nurture mutual growth and support for fair competition and transactions.
- Our "customer first" philosophy creates a sale and service structure that promptly responds to the various needs of customers.
- Our Procurement department evaluates candidate suppliers based on their overall strengths, including quality, technology, price, volume and reliability of delivery, as well as the stability of their business management and technological development capabilities.

Instructions

- Do not share competitively sensitive information (e.g. prices, costs, market distribution, etc.) with competitors.
- Do not enter a business arrangement with the sole purpose of harming a competitor.
- Do not agree with competitors to boycott a supplier or customer.
- Do not agree prices with suppliers while evaluating candidate suppliers.

Prohibited Transactions

Overview

European Union has adopted regulations that restrict exports and transactions with certain countries, entities, and individuals. These trade restrictions limit or prohibit transactions with certain designated individuals and entities, as well as with certain sanctioned countries, currently including Iran and North



Korea. To help avoid the risk of engaging in prohibited transactions, each business activity must first determine if intended transaction is appropriate for its activity (see instructions below). Violations of these regulations could hurt our Group's reputation and subject it and the individuals involved to heavy penalties and fines. We, as a Group, must comply with these trade restrictions.

Instructions

- Always consult the updated sanctions map: <https://www.sanctionsmap.eu/#/main>
- Make sure you are not exporting to a prohibited destination.
- Be sure you have performed a business review to determine if transaction is prohibited.
- If the above process identifies a transaction that must be rejected or blocked, you must report it immediately to your Director, as well as our Internal Audit department.

Money Laundering

Overview

Everyone must follow our policies and procedures that have been developed to avoid involvement in any money laundering scheme, and to ensure that our Group complies with regulatory framework. Money laundering is the use of transactions by criminals, terrorists, or others to conceal the illegal source of the funds. Money laundering involves transactions which, when completed, appear to be legitimate. The actions of even one person in our Group in assisting with money laundering, even if acting on his or her own, could subject our Group to penalties and hurt its reputation.

Instructions

- Look for any suspicious transactions
- Any suspicious activity should be reported promptly to one of the following:
 - Your Manager
 - Your Director
 - Group Human Resources Director
 - Legal Manager
 - Internal Audit department
 - Executive Assistants

Rest assured that all reports are treated confidentially.

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

