



DOCUMENT TITLE

**CODE OF CONDUCT AND ETHICS**

<b>OPERATING AREA</b> GC – GOVERNANCE & COMPLIANCE	<b>GROUP POLICY</b> P02 – CONDUCT AND ETHICS POLICY
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<b>DOCUMENT ADDRESSED TO</b> The Staff of Quest Holdings and Subsidiary Companies.
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<b>DEGREE OF CONFIDENTIALITY: PUBLIC DOCUMENT</b>
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## 1 Introduction

The relations of Quest Holdings Societe Anonyme (hereinafter the "**Company**") and the companies of the Quest Group (hereinafter the "**Group Companies**") with third parties, as well as the relations between the employees and the Company and the Group Companies, are governed by the framework of the fixed principles and values of the Group.

The uncompromising observance of this framework of values and the conformity to Greek law and the law of the states in which the Group operates, is both a condition and a guarantee of faultless conduct in terms of ethical conduct.

The Group Companies shall follow good business practices that are based on transparency, integrity and credibility.

This text has been translated into English from the Greek language. In any case of ambiguity or doubt, the Greek text prevails.

## 2 Purpose

The purpose of this Code of Conduct and Ethics (hereinafter referred to as the "**Code**") is to determine the commitments and rules of conduct of the Company and the Quest Group Companies as to the principles and rules that must govern each of their areas of activity, and the relations between the Company, the employees and all the interested parties.

This Code is a guiding tool for demonstrating good professional conduct, ethics and integrity.

## 3 Scope - Compliance with the Code

The Code is applied by the Management and the employees of the Company and the Quest Group Companies (hereinafter "**We**"). Furthermore, the companies and professionals cooperating with the Company and the Group Companies, and all interested parties, in general, must observe and apply similar standards and rules of conduct and ethics.

The members of the Board of Directors, the senior management of the Company and the Group Companies as well as the executives in administrative positions of responsibility must:

- exhibit exemplary conduct;
- ensure compliance with this Code by employees; and
- create a working environment where any complaints, concerns, thoughts and suggestions can be freely expressed.

It is the personal responsibility of everyone within the Company and the Group Companies to:

- remain aware of the requirements of that Code and participate in the relevant seminars and actions for its communication;
- comply with the requirements of this Code and not infringe or circumvent the regulations and principles of this Code for any reason;

- report any breaches and concerns regarding the implementation of this Code to their line managers and/or the Regulatory Compliance Officer through the communication channels notified by the Company.

## **4 Code of Conduct and Ethics**

### **4.1 Principles and Values of the Company**

#### **4.1.1 Human Rights, Diversity and Respect**

Our behavior towards our people is governed by the principles of fairness, transparency, dignity, respect and understanding.

We always apply strictly the applicable labor legislation and internationally recognized human rights, such as the 10 Principles of the UN Global Compact (*relevant Group Human Rights and Diversity Policy*). We also require partners across the supply chain of our operations to demonstrate the same principles.

We recognize respect for diversity as a key pillar to ensure a functional and efficient work environment. In this context, we provide equal employment opportunities and prohibit behaviors and actions of all kinds of discrimination such as gender, religion, race, color, nationality, disability, social class, political beliefs, age, marital status, sexual orientation or any other personal feature.

We strive to strike a balance between professional and personal life and explicitly prohibit verbal or physical violence and harassment of any kind such as sexual, psychological and moral (mobbing) or bullying situations of any kind within the workplace (*ref. Labor Relations Policy*).

#### **4.1.2 Health and Safety**

We are committed to ensuring a completely safe and healthy work environment (*ref. Health and Safety Policy*). We take strict measures to prevent possible accidents and injuries of employees during the performance of their duties and encourage the immediate reporting of incidents of injuries or other unsafe conditions in the workplace. We take actions to address general risks, by providing training on health and safety issues.

#### **4.1.3 Environmental Responsibility**

We care for the protection of the environment and we fully comply with the applicable legal, regulatory or other international framework (*ref. Group Environmental Management Policy*). We act with the aim of effectively and effectively limiting the environmental impact of our business. The Group's Management uses the UN's Sustainable Development Goals (SDGs) as a reference framework, and also follows the Greek Sustainability Code.

#### **4.1.4 Business Ethics and Regulatory Compliance**

Responsible business, full compliance with applicable law, as well as our applicable policies and procedures, are absolute values, inextricably linked to our business model, history, reputation and ability to achieve our goals. We are committed to our full compliance with the legislative and regulatory framework set by the Greek State, the directives of the European Union, and we always follow ethical business practices of high added value.

#### **4.1.5 Money Laundering**

Within the sphere of our influence, we take measures to avoid money laundering through our transactions with third parties. These measures may include:

- making payments for business purposes only;
- confirmation of the identity of the parties to the transaction;
- monitoring the work of third parties (suppliers, consultants, etc.) and adequately checking our transactions;
- complying with the necessary supporting documents and documents confirming the validity of our transactions.

The Regulatory Compliance Officer of the Company and each Group Company is responsible for the supervision and taking of all necessary measures in order to effectively limit the likelihood of money laundering.

#### **4.1.6 Maintaining Independence from Political Activities**

We are not involved in political and ideological matters. We refrain from financing political parties and using any form of Group resources and assets to reinforce such purposes. We respect the active participation of our colleagues in political activities and matters of public interest. However, any participation in political activities is allowed to take place on an individual level, by providing personal resources and time and without any reporting or exploitation of the relationship with the Company or the Group Companies.

#### **4.1.7 Personal Data**

We protect the personal data of the staff of the Company and the Group Companies, as well as those that deal with them, we handle them with responsibility, transparency, always respecting the required relevant legislation and retaining only what is necessary for the performance of their work duties.

## 4.2 Obligations to Third Parties

### 4.2.1 Offering and Acceptance of gifts

We do not accept or offer money or anything of value, as gifts, for the purpose of obtaining personal benefits from third parties trading with the Company.

We do not offer a gift or benefit to third parties that exceeds the limits of normal professional practice and courtesy (such as low-value promotional material that usually bears the Company's logo, symbolic gifts in a festive period that are considered socially acceptable) and after having informed and consulted the Regulatory Compliance Officer.

We do not offer a gift or benefit of any value to a civil servant or official when there are situations that can be considered that we aim to lure them to the benefit of the Company or the Group Companies.

We do not accept promotional gifts or other benefits (invitations to social events or any form of entertainment, excursions, sporting or cultural events, trips, etc.) from third parties if they are intended or give the impression that they are intended to influence our judgment or decision, or that they are given in exchange for us to act or fail to act.

Each individual employee may accept promotional gifts or items that are offered within the limits of normal professional practice and courtesy, if their value is not significant (up to approximately 100 €) and provided that their Head and/or and the Regulatory Compliance Officer is informed. More specifically, as regards promotional gifts of greater value, the Regulatory Compliance Officer and the Management of the company shall decide whether or not to accept such a gift or consider the possibility of converting the gift into credit memo.

The recipient of any gifts as part of our partners sales incentives policy to achieve specific objectives is the Company or the Group Companies, following an agreement, which shall define the relevant rules for the offering of such gifts to staff.

We inform the Regulatory Compliance Officer of any offer or request for gifts or other benefits from third parties.

### 4.2.2 Bribery and corruption

The Company maintains high standards of ethics and integrity. We have a zero-tolerance approach when it comes to bribery and corruption.

**Fraud** is any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead a person to obtain a financial or other benefit or to avoid an obligation.

Fraud can be committed by one or more persons and may involve employees and / or third parties (customers, suppliers, subcontractors, etc.).

We do not tolerate any form of fraud and any act or omission that could put us at risk of fraud. We must immediately report any incidents of possible fraud or situations that could expose the Group to risk.

**Corruption** is the abuse of power for personal gain. Corrupt practice means the offering, giving, receiving or soliciting, directly or indirectly, of anything of value to influence improperly the actions of another party.

**Bribery** is a type of corruption, and involves the act of promising, giving, or agreeing to receive some item of value with the corrupt aim of influencing a person to act or to reward a person for having acted in breach of his or her lawful duties.

It is expressly forbidden by any employee to offer or promise any benefit to a person or a body in the private and/or the public sector, in order to ensure a business advantage or favorable treatment in purchases, sales and promotions of the Group's or the Company's affairs.

We immediately inform the Regulatory Compliance Officer in case we are asked for any consideration from third parties with respect to the affairs of the Company and the Group Companies. Committing a crime of bribery and all forms of corruption by the Company and the Group Companies may be punished by civil, criminal or disciplinary sanctions as provided for in the legal framework and in the Company's and the Group Company's internal policies and procedures.

#### **4.2.3 Sponsorship and Donations**

We provide donations and sponsorships to organizations, associations, institutions or administrative services in the context of Corporate Social Responsibility to support education, sports, culture, social care, science or other related actions with a public benefit purpose. Our donations should not give the impression that they are intended to obtain commercial benefits. We also provide donations or sponsorships to natural persons (e.g. scholarships to students, sponsorships to students, etc.) always in a transparent manner and in accordance with the relevant legislation or policy/directive of the Company and the Group Companies.

All donations shall be fully transparent and in conformity with the principles of legality and morality. For this purpose, full documentation and management records are kept, including updated records of approvals by Management, and records of documentation and management of each donation or sponsorship.

#### **4.2.4 Customer and Supplier Relations**

The relationships between us and our customers and suppliers are governed by trust, mutual respect and integrity seeking thereby to establish long-term partnership and to mutually satisfy the interests of both sides. Every transaction with a customer and supplier is carried out fairly, responsibly and with full transparency without any intention of deceiving or exploiting it and in accordance with the policies and procedures of the Company and the Group Companies.

We take measures to ensure that our national and international business transactions are in compliance with the legislation in force, with all applicable trade regulations and applicable restrictions imposed by international or national authorities (United Nations, European Union) in countries, entities (companies, organizations, etc.) and persons.

#### **4.2.5 Cooperation with the Supervisory Authorities**

Our competent officials respond to requests and inquiries that may arise from the Supervisory Authorities. The provision of information regarding the above requests is carried out in a timely manner and always by the duly authorized persons of the Group Companies, while all information to these authorities must be absolutely transparent and accurate.

#### **4.2.6 Financial Transactions Records**

We keep detailed and accurate records for all our financial transactions (receipts, payments, donations, sponsorships, etc.), with full and relevant justification and documentation, with the main purpose of enhancing transparency in the transactions carried out by and to each Company.

We adopt and implement an adequate and effective internal control system so that the Company's transactions and assets are accounted for and recorded correctly and fully based on the applicable accounting principles and the legislation in force. Any report or file created and used internally for decision making or published to inform shareholders and the investing public, as well as the competent authorities, reflects the actual financial situation of the Company and the Group Companies.

#### **4.2.7 Competition Law**

We operate and develop our business always in accordance with all the rules of applicable competition law.

We base our competitive position solely on factors related to innovation, reliability and the provision of high quality products and services and we do not seek to obtain an advantage through unfair business practices or illegal actions.

We do not engage in practices such as agreements with competitors on prices, we do not exchange confidential information with competitors, we do not agree on market shares / customers with competitors and we do not exploit our strong position in the markets we operate.

### **4.3 Obligations and Commitments of Employees**

#### **4.3.1 Conflict of Interest**

Each employee has a duty of loyalty to the Company. Employees of the Group Companies must avoid situations where their personal interests are in conflict with their obligations to serve the interests of the Company or the Group and do not proceed either on their own account or on behalf of a third party in any competitive activity.

Potential conflict of interest situations are likely to arise when making decisions on behalf of the Company (e.g. selection of partners, recruitment, procurement). They may also arise when employees enter into relationships or transactions outside the Company (e.g. other business

relationships, relationships with public authorities, personal transactions with customers or suppliers of the Company, use of confidential information).

The aforementioned potential or actual conflict of interest situations shall be communicated by each employee in time to his/her Head and the Regulatory Compliance Officer in order to take adequate measures to resolve or avoid the conflict of interests.

Specific provisions and obligations apply to the members of the Board of Directors (ref. Group Conflict of Interest Resolution Procedure).

#### **4.3.2 Data Protection and Confidentiality**

The ethical principles of the Company and the Group require the confidentiality of sensitive information (such as financial data, trading strategies, investment data, etc.) concerning the Company and the Group Companies and the parties carrying out business with the Group.

Employees have the responsibility to ensure the confidentiality of the above information and not engage, in the course of their duties, in operations that may lead to the disclosure of important and confidential company information or data. Employees must maintain confidentiality, protect any privileged information in their possession and use it only for purposes for which they are authorized either during or after the termination of their employment contract in any way and on perpetual basis.

We implement mechanisms for the protection and proper information of shareholders and the investing public in relation to information that could affect the stock market value of the Company and we proceed in due time to the required disclosures. Any person (employee or third party) who becomes aware of the above information may not use such information to carry out stock exchange transactions in shares of the Company. It is also prohibited to disclose preferential information to third parties outside the Company (*ref. Privileged Information Handling Process*).

#### **4.3.3 Assets and Facilities**

The assets and facilities of the Company and the Group Companies must always be used in an appropriate manner and only for the intended business purposes. It is an obligation of every employee to protect the assets of the Company and the Group Companies and to report immediately any identified theft, loss or any kind of sabotage to the assets of the Company.

#### **4.3.4 Intellectual property**

Products or services developed in the context of the Company's and the Group Companies' activity shall constitute their intellectual property and significant assets of the Company and the Group Companies based on their object. To this end, employees must:

- protect the particular features, ideas or patents developed by the Group Companies;



- not dispose of or provide – other than their respective responsibilities as employees of the Company or the Group Companies for their own benefit – a product or service to a third party.

The aim is to maintain the strong position of the Company and the Group Companies in their field of activity, as well as, inter alia, to avoid any situations of conflict of interest.

#### **4.3.5 Internet Behavior and Mass Media**

Employees must use social media wisely and carefully in order to ensure the confidentiality of corporate issues, as well as the protection of their personal reputation and the reputation of the Company. Furthermore, employees shall not make any announcements to the media regarding the Company or the Group Companies and in particular on matters of confidential information or intellectual property rights without the prior written approval of the Company. At the same time, it is mandatory for all staff to respect the privacy of colleagues, as well as external partners or third parties with whom we cooperate/trade.

#### **4.3.6 Complaints regarding breaches of the Code and protection of the complainant**

The employees of the Group Companies must report any incident they identify which, in their view, is contrary to this Code - which may also include fraud - to their line Manager and / or the Compliance Officer and / or the Chairman of the Audit Committee, in case it is not possible due to the nature and subject of the report.

Employees are encouraged to file the above reports / complaints in good faith and with the intent to protect the Company and the Group Companies and shall not be subject to any disciplinary action, victimization, threats, or other adverse treatment.

The Company and the Group Companies may take any appropriate action against the complainant, in case it is proven that s/he intentionally defamed or provided false information to the Company or to third parties, in breach of the Code or its provisions (*ref. the Regulatory Compliance System*).

The management of any violations of the Code constitutes the responsibility of the Regulatory Officers and shall be carried out in a fair, consistent and transparent manner and always in accordance with the applicable legislation and the applicable regulations governing the Company and the Group Companies. Any violation of the Code may lead to sanctions commensurate with the type of violation, in accordance with the applicable legislation.

#### **4.3.7 Observance and compliance with the Code**

All employees of the Company and the Group Companies must read and understand the Code, seek guidance when required and to comply with its spirit.

They must not behave in any way that could be detrimental to the Group's reputation.

They must protect confidential information, protect the assets of the Company and the Group Companies and avoid situations of conflict of interest.

Transactions with all public authorities, customers, suppliers and investors should be fair and based on honesty and integrity.

Employees who, in the course of their duties, deal with suppliers and customers must bring the Code to their attention and ask them to observe its rules, if so required.

## 5 Validity of the Code

The Code of Conduct and Ethics is approved by the relevant Boards of Directors of the Company and the Group Companies and each Company must ensure that the principles incorporated therein are communicated, understood, and observed by all employees.

## 6 Implementation Control

The Group Compliance Officer shall regularly evaluate the adequacy of this Code and guide the Management and the employees of the Company and the Group Companies to ensure its effective implementation.

## 7 File of Changes

Version	Date	Description
1 <sup>st</sup>	17/07/2021	Original code version
2 <sup>nd</sup>	27/01/2022	Amendment of paragraphs 4.2.2, 4.3.6, addition of paragraphs 4.3.7 and 5