

EKTER S.A.

CODE OF CONDUCT AND ETHICS

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1. Message - Statement by the Management

In these challenging economic and social circumstances, with our hard work, devotion and passion, we can now be proud of the performance and presence of our Company and be leaders, both in the community of successful partners of the country and economy and in society.

EKTER S.A. has significant experience, know-how and production capacity, holding a 6th class contractors' degree, as well as a business structure that is characterised by a particularly extensive construction basis and increased competitiveness, allowing it to tender and efficiently implement a large number of projects of different budgets and technical specifications.

EKTER S.A. believes it is fundamental for its corporate culture to comply with the applicable regulatory and legislative framework in force, international practices as well as with the standards and rules of conduct and ethics. Our customers, both from the public and the private sector, choose to work with us because they trust that EKTER S.A. operates in a sustainable, responsible and ethical manner, respecting the needs of its employees, customers, society and the environment. Compliance with the principles of conduct and ethics is an integral part of our Company's dynamics, credibility and successful long course.

As any modern business would do, EKTER S.A., during its long history, has firmly expressed its commitment to integrity and maintaining high standards of ethics in all its works, and promises to always try to stay true to its Principles. The long-term success of our business is based, mainly, on our operating according to specific principles and values, which we are committed to implementing.

The key tool in meeting the above commitment is the development, issue and acceptance of an integrated Code of Conduct and Ethics (hereinafter

“the Code”), which sets out with clarity the standards of conduct to be adopted by the personnel of EKTER S.A. and by any third party acting on its behalf.

This Code of Conduct and Ethics contains and presents in writing all the main principles and rules implemented by EKTER S.A. since its establishment and having contributed to its success. The Code is in full compliance with our company’s Internal Regulation, as approved by the Board of Directors. To our philosophy, compliance with this Code is a prerequisite for preserving the reputation, prestige and credibility of our name, nationally and internationally, and for preventing any exposure of our Company to relevant risks.

This Code of Conduct and Ethics includes the fundamental principles, rules and values that shape the framework of corporate activities and determine our daily conduct and practice. The main values which form the basis of this Code are: lawful behaviour, integrity, responsibility, transparency, fairness, respect for human rights, confidentiality, avoidance of conflict of interests, environmental protection and occupational safety. These principles are fundamental for developing the necessary framework, in order to continue our activity according to the highest ethical standards.

The strict implementation of the Code is an obligation for everyone, regardless of their rank and/or position or form of service provided. The purpose of this Code is to operate as a compass in the performance of our duties, by identifying uniform principles and rules of conduct, which shall be complied with by the relevant employees of EKTER S.A. (regardless of their position in the hierarchy of the company), Board members, salaried personnel, subcontractors, affiliates, advisers, intermediaries, interest representatives, suppliers, contractors and any party acting on the company’s behalf. Any third parties who work on behalf of EKTER S.A. are required to comply with the principles described in this Code, as well as with any legislation or contractual term in force and prevent actions which may

be inconsistent with the commitments undertaken by EKTER S.A. with the adoption of this Code.

Each one of us needs to take personal responsibility for the implementation of the Code, to allow our company to maintain its reputation. When dealing with the Company's affairs, during their transactions with State or other Authorities and Entities as well as with other businesses, Company employees and associates are required to behave in accordance with the Corporate Values and commitments, showing moral integrity and social responsibility. Failure to comply with national laws and regulations, as well as with our internal policies and guidelines, may jeopardize not only the reputation of EKTER S.A. but also the relevant individuals themselves.

The Code is available on our Company website (www.ekter.gr). Through this disclosure, our Company enhances transparency, as it allows all interested parties to be informed and assess the core of values, rules and principles governing its operation.

Each member of our company's staff, as well as any third party acting on behalf of our company should take the time to carefully read the Code; for any doubts and questions, they may address their Manager, the HR Department or the Compliance Officer, to obtain clarifications and guidelines.

For EKTER S.A.

The Chairman of the Board

2. Introduction

2.1 Scope

This Code of Conduct and Ethics includes the fundamental principles, rules and values that form the framework of corporate activities and define the ethical and professional conduct of all individuals employed by EKTER S.A. or acting on its behalf.

The purpose of the adoption of this Code is to establish rules governing the relations of EKTER S.A. with its personnel, external associates, employees and contractors, with the market and with the environment.

The Code contains rules on the smooth operation of the company, the development of an efficient and effective system of planning, execution and control of its activities, the implementation of the Code and the prevention of actions that may conflict with the rules contained in the Code, whether performed by personnel members directly employed by EKTER S.A. (regardless of their position in the company hierarchy) or by any third party acting on behalf of EKTER S.A.

It is noted that this Code provides a set of guidelines based on the Corporate Values and commitments, with the purpose of the conduct of all persons employed or acting on behalf of EKTER S.A. being governed by moral integrity and social responsibility. It is, however, clarified that the Code cannot include the exhaustive list of situations which may arise for persons related to EKTER S.A. It is of critical importance not only to comply with the letter of this Code but to also take into account the broader spirit of the text, in order to comply with the “spirit of the law”.

For this reason, everyone should remain responsible for their own actions and seek guidance on good business conduct, when necessary. Each employee or external associate of EKTER S.A. is required to read and

assess all the rules and principles included in the Code, in order to be able to properly judge and identify any behaviour that may expose EKTER S.A. and its reputation at risk.

This Code is an integral part of the contractual terms of cooperation, both with the personnel directly employed by EKTER S.A. and with third parties (subcontractors, suppliers, advisers etc.) acting on its behalf.

This Code was prepared by care of the legal advisers of EKTER S.A. and approved by the Company's Board of Directors (BoD). Any amendment or deviation from the Code requires the approval of the Company's BoD.

2.2 Definitions

For the purposes of this document, the following terms and expressions have the meaning ascribed to them herein:

“Company” means EKTER S.A., including its activities related to the construction of projects, whether in part as consortium member or in whole as EKTER S.A.

“Code” means this Code of Conduct and Ethics of EKTER S.A.

3. Compliance with legislation

EKTER S.A. is committed to integrity and maintaining a high level of ethical conduct in all its operations. Honesty is the core of any professional relation and the basis for any business decision and action; therefore, the conduct of its employees is required no to leave any doubt as to the Company's ethics and integrity.

Compliance with the legislation in force not only prevents the imposition of fines to the Company but mainly contributes to maintain its good reputation in

the market. We are all required to comply with every rule of law established by the Greek State, while we are also required to observe all Policies and Regulations established by the Company for its successful operation.

The key concern of the Legal Advisers of EKTER S.A. is to protect and maintain the legal and ethical integrity and reputation of EKTER S.A. This is achieved by instructions to the Company's Board of Directors, in order to ensure that its policy, decisions and business operation are in line with its values and principles and in accordance with the national and international law in force. Furthermore, the Legal Advisors are immediately informed of any changes to the legislation and notify the management of the company.

The Organisation and Planning Department of EKTER S.A. works on labour law issues and aims at the full compliance of the company and its personnel with the labour law in force.

The Tender & Project Support Department has the task of awarding contracts to subcontractors and ensures that the relevant awarding process is in accordance with the legislation in force, while contracts are drafted in a transparent manner and in accordance with applicable rules.

Finally, EKTER S.A. requires all its employees to comply fully with all laws and Regulations on the protection of health, safety and the environment.

4. Commitments of the company in the context of its external relations

4.1 Free Competition

EKTER S.A. operates in a free market environment, addresses its competitors with respect and believes that fair and honest competition contributes to the society. For this reason, the Company takes action to achieve competitive results that reward skills, experience and efficiency. Our Company is

expressly committed to the strict observance of all competition rules. We are required to know that any breach of the rules of fair competition implies various adverse consequences, both for the company and the natural persons involved.

EKTER S.A. believes that fair competition allows the development of the free market with the subsequent social benefits. Therefore, employees and associates are required to adhere to the rules of fair competition.

Violations of the competition law may concern discussions with persons or companies (suppliers, subcontractors etc.) with interests competing with those of the company on matters of prices, tenders, profit, cost or any other aspect related to the competitive conduct of the company, in order to conclude agreements restricting free competition, such as market sharing agreements.

Any action that may jeopardise fair competition is contrary to the policy of EKTER S.A. and is prohibited for any individual acting on its behalf, while it cannot be justified, under any circumstances, as a means of pursuing Company interests.

4.2 Addressing bribery and corruption

Bribing is one of the most devastating issues, being internationally difficult to address. With more than one trillion dollars paid in bribes every year internationally, according to the OECD (Organisation for Economic Cooperation and Development), the impact is devastating for all, deteriorating the quality of life, increasing poverty and eroding public trust.

“Bribery” means offering any item worth more than €50 in order to influence a decision or receive an unfair advantage. “Passive bribery” concerns accepting such an offer. Passive bribing does not only concern accepting cash. Accepting luxury gifts and products, scholarships, tickets to sports events,

jewellery or gemstones is also characterised as passive bribery.

“Corruption” means the abuse of delegated power for personal gain and it also includes extortion, fraud, unfair influence, money laundering, nepotism and conflicts of interest.

A significant aspect of the terms “bribery” and “passive bribery” is the purpose of the payment. Anti-corruption laws prohibit the acceptance of any item of value for operation acquisition, maintaining existing operations or ensuring an inappropriate advantage. This also includes: ensuring licenses or regulatory approvals, preventing adverse State actions, reducing taxes, evading duties or preventing a competitor from tendering.

Our Company places great emphasis on integrity and transparency in all forms of its business operation and does not accept any bribery or passive bribery of its employees and associates. EKTER S.A. expressly forbids its employees and associates any direct or indirect (i.e. through a third party) bribery, payment in return or other inappropriate payment or promise of payment to any natural person or organisation, in the private or public sector. For this reason, it takes appropriate measures to prevent and avoid actions related to bribery and passive bribery. It is the intention of the Company to ensure that all departments and employees, natural persons and entities working for it or acting on its behalf take appropriate measures to identify and/or prevent such behaviours or attempts.

The objective of EKTER S.A. is:

- That its personnel and associates adopt clear principles and rules for preventing bribery.
- To abstain from any action of bribery - passive bribery.
- To raise awareness in its personnel so that they may be able to identify and prevent or avoid actions related to bribery/passive bribery.
- To encourage whistleblowing of suspicious actions, creating business communication channels that ensure protection and confidentiality for

individuals.

- To enhance immediate action against individuals involved in bribery, considering that the Company has zero tolerance for corruption.

It is also noted that EKTER S.A. strictly prohibits “facilitation payments”. Said payments or offers may include the offer/provision of small payments to low-rank state officials for actions such as ensuring or accelerating a routine task, for which EKTER S.A. has claim. Note that time pressure does not in any way justify any such payment.

In cases where a facilitation payment is requested and its non-payment implies a direct threat to the health, safety or physical integrity of an individual, the relevant payment shall be reported immediately after it was made to the Manager or the Internal Audit Department or the Compliance Officer.

As regards gifts, donations, tips or offers in the form of presents, EKTER S.A. uses strict procedures to ensure that no malicious or inappropriate behaviour is involved. Accepting gifts and donations that may question the integrity of the company or seem to affect its professional decisions is strictly prohibited.

Any type of gift, service or free provision offered to any third party or received by any third party must be of a reasonable and comparable value and should never be used for an unfair purpose, such as project awarding, ensuring or preserving an action or omission, as this may constitute bribery.

The prevention, avoidance and reporting of similar cases is a responsibility for all employees and associates of the Company. Each employee, in order to protect the good reputation of EKTER S.A., is required:

- Not to accept, directly or indirectly, gifts or any item of value, other than promotional items of symbolic value, which usually bear a company logo (e.g. pens, notebooks, t-shirts, hats). If gifts or any item of value is offered to them, employees shall kindly refuse and notify their

manager. Not to offer or promise any financial or other benefit to any person in order to tempt them to act improperly or reward them for an improper action/activity.

- Hosting events related to business operation, promotional and other business expenses (such as transportation to a construction site, invitations to social events or dinners) may be accepted or offered only when they are of sufficiently limited value and in a form that cannot be considered as bribery. The relevant expenses shall be reasonable and proportionate. If not, they constitute a misconduct, even if they do not require any inappropriate action by the recipient thereof.
- Gifts, as well as reception and accommodation costs, shall be offered openly and transparently, be appropriately approved in accordance with the expense procedures of the Company and accordingly recorded in the financial data.
- To request the approval of the Internal Audit Department or the Compliance Officer on the offer of an invitation to lunch/dinner or to a sports or cultural event to a customer. Any issue concerning the offer or acceptance of gifts, accommodation and similar benefits shall be discussed and agreed between the individual concerned and their manager. If no agreement can be reached, the individual is entitled to address the competent Manager, the Internal Audit Department and the Compliance Officer.
- Not to act in their capacity as employees to ensure any type of advantages or benefits within/outside their service.

When transacting with third parties and other persons who conduct work on its behalf, EKTER S.A. is required to exercise due diligence in order to avoid its involvement in actions of corruption which may be effected by these third parties.

All business transactions of EKTER S.A. shall comply with the national law in force on combating bribery and corruption and with the provisions of the FCPA (Foreign Corrupt Practices Act), the UKBA (UK Bribery Act) or laws

of other countries where EKTER S.A. may operate.

4.3 Collaboration with state authorities and public officials

EKTER S.A. is in full compliance with the legislation in force when transacting with state and public officials.

“State and public officials” are employees of any state, including all employees of bodies acting on behalf of the state. “Public official” means any person elected to political office or standing for election, any political party executive or employee or any other person officially acting on behalf of a political party.

EKTER S.A. strictly forbids its personnel and any third parties acting on its behalf to perform actions with the purpose of corrupting public or state officials. The offer, promise, approval of payment, provision or acceptance of illegal commission, bribery or offer/acceptance of similar payment of any type, offer/acceptance of goods, as well as personal facilitations to/from public or state officials is forbidden, even when made through third parties. Furthermore, during any business negotiation (whether concerning a request to the public administration or for any current relation with public administration) it is forbidden to enter into personal relationships with public administration employees with the aim to ensure benefits, influence and intervention in order to directly or indirectly affect the decisions of public officials or public administration employees.

4.4 Relationships of the company with external associates

EKTER S.A. acknowledges that an organisation’s competitiveness and ultimate success is the result of teamwork and includes third party contribution from associates, suppliers, investors etc.

The relationships of EKTER S.A. with external associates, subcontractors,

suppliers, designers and contractors across the entire range of its operations shall be in accordance with the law and principles of fairness, transparency, trust, honesty and integrity. It is an integral part of the corporate culture/practice of EKTER S.A. to respect the rights, protect and treat in an equal manner all entities cooperating with it.

The decisions on the selection of these associates are taken based on strict but fair criteria, in compliance with the relevant legal and regulatory provisions and requirements. The prerequisites of EKTER S.A. for launching and maintaining a collaboration include credibility, integrity, honest behaviour, impartiality, product and service quality, pricing policies, punctuality and prudent business management.

The Company acknowledges that its financial and social performance may be affected by the practices of its associates and it therefore requires from all its associates, designers, subcontractors, suppliers and consortia members to respect its Principles and Values, to comply with them and to adopt and implement relevant policies and procedures.

When concluding business agreements with third parties, EKTER S.A. ensures the following:

- Compliance with the Code of Conduct and Ethics in force.
- Assessment of the experience, reputation and overall image of third parties - associates.
- Full transparency during the associate selection process, implementing strict and objective criteria.
- Equal opportunities for all interested parties seeking cooperation.
- Observance of the terms of the contracts it concludes with third-party associates and ensuring timely resolving of any disputes with them.

The non-negotiable principle in the policy of EKTER S.A. is that any business relationship with associates, suppliers, designers, subcontractors and contractors who have been proven to implement unlawful or anti-

competitive practices shall be immediately terminated.

EKTER S.A. continuously and carefully supervises its relationship with private or public external associates through the Tender & Project Support Department and immediately terminates any business relationship with associates that have been proven to implement unlawful or unfair competition practices.

5. Political activities and lobbying

The personnel of EKTER S.A. or persons acting on its behalf are strictly forbidden to make any direct or indirect (via third party) contribution to any political party, movement, committees, political and trade unions or the representatives or candidates thereof.

Any employee of EKTER S.A. or third party acting on its behalf (e.g. subcontractors, suppliers etc.) has the right to participate in political organisations, parties, committees or movements, provided they clarify that they do not express the views of EKTER S.A. nor act on its behalf.

6. Contract award procedures

The Tender & Project Support Department of EKTER S.A. has the task of awarding contracts to subcontractors and ensures that the relevant awarding process is in accordance with the legislation in force, while contracts are drafted in a transparent manner and in accordance with applicable rules.

EKTER S.A. ensures fair treatment of all parties that participate in tendering projects awarded by EKTER S.A. and in projects tendered by EKTER S.A.

In order to ensure compliance with the principles of ethics and the law on combating bribery, the following contract awarding requirements are of key

importance:

- contract awarding starts with an invitation to tender for potentially interested subcontractors
- suppliers or subcontractors meeting the required criteria should be invited
- an adequate number of the above should be invited
- any deviation shall be documented and approved by the entity performing the selection process
- the Tender and Project Support Department of EKTER S.A. is entitled to select freely among the submitted offers, regardless of the amount
- procurement procedures may not apply to urgent situations or emergencies (e.g. emergency safety measures in construction site due to unforeseen events).

7. Sponsorships, donations and charities

Our Company looks forward to high level of social responsibility through respecting and promoting the human values, as well as the social, cultural and artistic values of the countries where it operates.

In this context, we adopt Corporate Social Responsibility actions without expecting to ensure any advantage in return, with the sole objective of our charitable activity being consistent with the vision and pursuit of sustainable development. The charity activity of EKTER S.A. is a commitment to society, while the relevant actions of our company aim to achieve significant charity goals (related to education, science, arts, culture etc.) in the communities where we operate.

Contrary to donations, sponsorships are designed to ensure a specific business benefit and, to this end, are only allowed when said benefit is not inappropriate or unethical, while sponsorships to political parties, like donations in charities related or funded by a state official, are strictly prohibited.

EKTER S.A. is particularly careful when assuming charity activities or making donations or sponsorships. The relevant activities shall be carefully examined, shall receive prior approval by the BoD of the Company and shall be conducted with transparency.

8. Duties and obligations of employees

8.1 Compliance with the definitions of the law

The purpose of EKTER S.A. is to ensure that the policy, decisions and business activity of the company are in line with the values and principles it has adopted and in compliance with the national and international legislation in force. For this reason, the company is committed to observing the legislation and law and be directly informed of any changes to the law.

The company personnel and any third party acting on its behalf is required to fully comply with the laws and regulations of the country where the company operates, as well as with the internal policies and procedures, while observing good market practices at any time. Infringements of the law are in any case forbidden.

8.2 Diversity

The philosophy of EKTER S.A. is based on the respect for each employee's personality. Protecting human dignity is a fundamental principle and, therefore, developing a harmonious workplace is a constant pursuit of the company.

To this end, the company:

- Rejects any form of social exclusion.
- Offers equal opportunities for job promotions and professional careers and establishes recruitment practices that comply with statutory conditions and employment criteria that are essentially based on each

- person's qualifications, regardless of gender, age, religion, nationality.
- Implements a merit-based system for assessing the performance, promotion and remuneration of personnel.
 - Takes actions to attract and retain personnel with knowledge and values to the company.
 - Invests in training personnel using modern methods, as well as in their development, creating a training plan per job, to ensure full use of their potential.
 - Focuses on their timely and smooth adapting to the ever-increasing demands for new knowledge, skills and specialisation in a rapidly changing business environment.
 - Our company aspires to workforce diversity and creating a workplace free from discrimination and harassment, based on respect and goodwill. We do not tolerate any type of insult to the personality (e.g. moral, sexual or other harassment, intimidation, persecution etc.) or unequal treatment due to nationality, racial origin, sex, marital status, religious or political beliefs or physical weaknesses, origin, physical skills, mental retardation, marital status or other characteristics protected by law.

EKTER S.A. encourages all employees and any third party (e.g. subcontractor, supplier etc.) acting on its behalf not to allow behaviours that offend the personal dignity of any individual or create or imply discriminations of any kind.

8.3 Criminal Record

All company's staff members or third parties acting on its behalf (subcontractor, supplier, designer etc.) are required to inform their Manager or the Internal Audit Department in case of any charges for any criminal offence pending against them. If so requested, they are obliged to provide clear information on the pending charge.

In case a company employee or a third party acting on its behalf is accused or has been found guilty for committing an offence or pleads guilty for an offence, they may be subject to relevant consequences in terms of their employment with the company. The above disclosure obligation does not apply to minor offences concerning less serious matters (e.g. Traffic Code violations).

8.4 Personal data

In all business processes, EKTER S.A. guarantees the protection of privacy and personal data.

For this reason, EKTER S.A., in full compliance with the legislation in force, collects, saves and edits only personal data strictly required for the conduct of its business activity.

To ensure the safety and protection of the privacy of personnel, associates and third parties non-authorized use of video recording, audio recording or otherwise recording and keeping data is not permitted.

EKTER S.A. encourages and recommends compliance with the obligation for respecting individual privacy to all personnel and third parties acting on its behalf.

8.5 Conflict of interests

Conflicts of interest occur when the personal interests of an executive, employee or associate of the Company directly or indirectly compete with the Company's interests. Many times, this conflict that arises between a person or family member thereof and the interests of the Company is not easily identified, due to confusion or doubt. Clearly, a conflict of interest is any event that may affect one's ability to provide an objective and impartial professional opinion.

Each employee of EKTER S.A. as well as any third party acting on its behalf shall not have a competitive relationship with the Company and shall avoid any job or activity that creates or seems to create a conflict between their personal interests and those of the Company.

Company employees, affiliates, contractors and other parties acting on its behalf are obliged to refrain, when exercising their duties, from activities with the purpose of acquiring personal financial interest or other personal gain/benefit, as such constitute a breach of their assumed obligation of trust to EKTER S.A. and are not in line with the professional activities they perform in the Company.

EKTER S.A. attaches particular importance and takes the necessary measures to handle cases of employees that constitute or may lead to conflict of interest in relation to the services provided by them. Without limitation, such cases may occur in particular when there is a discrepancy between the interests of the Company and the interests of the other parties involved (customers, shareholders, employees, etc.).

In order to prevent any actual or potential conflicts of interest, EKTER S.A. takes the following measures:

- Establishes procedures for identifying and managing actual or potential conflicts of interest between the Company and its top/senior executives, its employees and customers.
- Adopts rules promoting transparency and based on objective criteria.
- Informs with clarity its customers, personnel and associates of the general character of conflict of interest and the sources thereof, before starting their cooperation.

In the context of conflict of interest, each employee is required:

- To immediately report any interest of their own or of their relatives,

which may create a conflict of interests with the Company or prevents them from properly exercising their duties. In these cases, they shall not, under any circumstances, consider their personal interest, financial or otherwise, as higher than the interests of the Company.

- To disclose any family ties with colleagues or customers in order to prevent any potential/possible conflict of interest.
- Not to create common or mutual financial interest with the customers and associates of the Company, as this poses the risk of conflicts of interest which may result in disciplinary and legal sanctions against them.
- To treat customers in an objective manner, avoiding favourable treatment of specific persons or discouraging cooperation with others without a legitimate objective reason.
- Not to take advantage of their capacity as employees to ensure advantages or other benefits for themselves or their relatives.

Without limitation, conflicts of interest could arise in the following cases:

- Use of resources of EKTER S.A. for developing and promoting activities not related to the exercise of the duties they have been assigned to by the Company.
- Engaging in activities other than their duties to EKTER S.A. during their working hours.

8.6 Money laundering

EKTER S.A. fully complies with the provisions of the legislation in force regarding money laundering and terrorist financing.

“Money laundering” is the process of disguising the nature and origin of money associated with criminal activities, by illegally introducing money in the commercial network, so that it appears as legitimate or prevents the identification of its actual origin or owner.

EKTER S.A. encourages and recommends that all Company employees and third parties acting on its behalf comply with the legislation in force and offers ongoing personnel training on the prevention and addressing of such issues.

Furthermore, each employee and associate of EKTER S.A. is required to be cautious and report suspicious behaviour of customers, advisers and professional associates and avoid accepting funds or participating in any transaction or activity, if they deem that said funds are criminal activity proceeds.

8.7 Child and forced labour

EKTER S.A. does not accept any kind of child or forced labour and, therefore, forbids the employment of children or staff for forced labour by our company.

8.8 Compliance with import and export controls

Within the framework of crime prevention, many governments limit cross-border transactions and movement of goods. With the aim to contribute to the above goal, EKTER S.A. encourages and recommends that all staff members and third parties acting on its behalf comply fully with import and export controls and with the legislation in force regarding business transactions.

8.9 Communication with external entities – Use of social media

Unauthorised disclosure of information may damage the reliability and reputation of the Company; therefore, only authorised representatives of EKTER S.A. may make statements or provide data and information. It must be specifically stressed that in any kind of communication, either internally or

with third parties, the information provided must be accurate, valid and within the appropriate authorisation framework.

In particular, executives, employees or associates who plan speeches, presentations, interviews, articles, studies etc., wishing to represent EKTER S.A., should have the approval of the Company's Management.

When using social media, every EKTER S.A. employee or third party acting on its behalf should make clear that they do not express the views of EKTER S.A. or make statements on its behalf.

9. Disciplinary system – Disciplinary process in case of non - compliance

The strict observance of the Code is an obligation of all employees and associates of the Company, regardless of their rank or/and position or form of service provided. Any breach of the principles and rules of this Code may be considered as failure to fulfill essential obligations within the framework of employment relations or disciplinary rules and may entail legal consequences, including the termination of contract and the obligation to restore any damage caused by said breach.

The Internal Audit Department of EKTER S.A. implements a disciplinary system providing for disciplinary measures against breaches of this Code. The sanctions imposed are in proportion to the breach of the rules provided for by the Code.

In the event of a suspected or a proven breach of the Code, the Internal Audit Department must inform the Compliance Officer, who undertakes to confirm the alleged violation. In case such breach is verified, the Compliance Officer recommends to the Internal Audit Department and the Board of Directors (BoD) the imposition of sanctions. The Board of Directors of the company is exclusively responsible for the enforcement of the

sanction, following a relevant proposal by the Human Resources Department.

The sanction imposed shall be relevant to the seriousness of the infringement and shall necessarily take into account the following factors:

- a) The intention or possible negligence of the person having breached the Code.
- b) Any previous disciplinary sanctions imposed or disciplinary procedures regarding said person.
- c) The position held by said employee in the organisational structure of the Company. The severity of sanctions varies according to the position of the person in the Company's chain of command (board members, directors, managers, office employees, manual workers, etc.). Expectations from the persons who hold positions of responsibility are higher due to their leading role.
- d) The extent of the Company's report concerning the unlawful conduct of the employee or third party acting on its behalf.

10. Assets - data of the Company

10.1 Protection of assets

The fixed assets and office equipment of EKTER S.A., including company buildings, premises, vehicles, office furniture, computers, all office machinery, software and fixed equipment in general, corporate information, reputation and customer base, trademarks and trade names etc., are provided to the Company's executives, employees and associates, who shall use them in the best possible manner and with the utmost care for professional purposes and for the accomplishment of their duties, without wasting them.

The preservation and good use of the Company's assets is an obligation of us all and we must ensure that:

- a) they are not used to non-corporate ends,
- b) they are not used for unlawful activities and
- c) the Company's resources are not used for personal gain.

Employees are required to manage the Company's assets in a responsible manner and protect them against loss, damage, theft, inappropriate or unauthorised use. Moreover, the personnel of EKTER S.A. should respect the tangible, as well as intangible assets of the Company's associates.

The workforce of EKTER S.A. should protect corporate assets against destruction or unauthorised use. In the framework of their tasks/responsibilities, all employees should:

- Not use to their own benefit the assets and equipment made available to them by the Company.
- Use the Internet for work issues or for reasons related to the exercise of their work duties, without placing at risk the security of the Company's systems.
- Ensure that mechanical equipment (computers, telephones, fax machines and other devices) is only used by authorised persons, even in case of absence of said persons from their workstation for a few minutes.
- Safely keep their passwords for access to the Company's systems and not disclose them to third parties under any circumstances.
- Maintain confidentiality regarding the Company's transactions and operations and implement all measures envisaged, in order to safeguard, during transactions, the Company's interests and assets.

If any employee of EKTER S.A. or a third party acting on its behalf suspects a fraud or theft of the company's assets, they must immediately notify their Manager or the Human Resources Director or the Compliance Officer.

10.2 Data management

EKTER S.A. keeps records for storing and maintaining any information created and used for the exercise of its activities. Ensuring safety, accuracy and correct use of said information is fundamental to the operation of the company.

No member of the company's personnel or third party acting on its behalf is allowed to disclose or make in any way available information owned by EKTER S.A. and its customers that is secret or confidential.

“Confidential” means information that comes to the knowledge of employees, whether directly or indirectly, during the exercise of their duties, and which may concern the Company (such as various documents, details and data, methods and procedures followed by the company for the design, development and promotion of its products and services, financial data, contracts/agreements, personal data of employees, merger/acquisition plans and information related to the Company's development and strategy) in any form (graphs, databases, models, reports, organisational systems, machine diagrams etc.). The above information may also include unpublished financial information or information related to prices, supplier and affiliate lists and information on Company claims.

All Confidential Information is treated with due confidentiality and the laws and regulations in force are strictly applied. Any corporate information that may come to the knowledge of Company employees during the exercise of their duties shall be treated as classified and shall not be disclosed to third parties. The unauthorised collection, processing and transmission of such information is prohibited.

Therefore, EKTER S.A. establishes procedures and implements systems contributing to the controlled flow of information, so that it is notified to the competent persons and only to the extent necessary for the exercise of their

duties. In cases where the Company, in the context of project assignment at its order and on its behalf, needs to extend the circle of persons to whom Confidential Information will be disclosed, it takes all necessary measures, including the conclusion of a confidentiality agreement, to ensure that the parties involved in the relevant project are aware of the confidential nature and prohibition of use of said information.

The obligation to protect and correctly use such information and data continues to apply even after termination of employment at the Company. Any violation of these rules does not only constitute a violation of this Code but also a violation of the relevant legislation, entailing administrative and criminal consequences.

11. Personal Data Protection

EKTER S.A. recognises and gives primary consideration to the obligation of compliance with the legislation in force on the protection of individuals from the processing of personal data.

In this context, specific information is collected regarding the personnel, shareholders, customers with whom they maintain any form of business relationship, persons with whom they maintain collaboration relationships, as well as third parties in the context of any other relationship other than the above.

This information:

- Is collected in a fair and legitimate manner.
- Is collected for specified, explicit and legitimate purposes.
- Is kept only for the period of time required for the purposes of their collection and processing.

The obligation to protect personal data and correctly use such information and data continues to apply even after termination of employment at the

Company. Any violation of these rules does not only constitute a violation of this Code but also a violation of the relevant legislation, entailing administrative and criminal consequences.

12. Social responsibility - actions

12.1 Support of local communities

While offering financial support to local communities, EKTER S.A. stays in line with its commitment towards society to carry out actions for the achievement of significant goals (related to education, science, the environment, art, culture, etc.) in the communities where it operates.

In the above context, our Company may:

- Encourage social, intellectual and artistic life, contribute to the promotion of the national heritage and undertake the sponsoring of intellectual works and cultural events.
- Support programmes that promote sports.
- Generally support the work of recognised social institutions and organisations of public life.
- Provide support to programmes of research, development and creation of infrastructure, aiming to enhance the quality of human life.

12.2 Environment

It is a common belief that respect towards the environment and the implementation of a relevant Environmental Policy constitute an essential rule of good corporate practice and of business contribution to sustainable development, as well as to addressing problems that stem from climate change.

EKTER S.A. aims at minimising our impact on the environment, at constantly improving our environmental performance and at engraving environmental

responsibility within our culture. The Company takes initiatives in order to promote environmental responsibility in general, encouraging the development and integration of environmentally friendly technologies.

Our goal is to systematically implement policies for the protection of the environment and to reinforce the environmental conscience of the Company's workforce.

EKTER S.A. is committed to making continuous efforts to minimise the adverse impact of its services on the environment; therefore, it implements practices aimed at continuously improving its environmental performance. The purpose of environmental protection should govern the design, planning and construction of the projects that the Company is required to execute.

In the context of its environmental responsibility, the Company:

- Commits to being environmentally responsible and takes initiatives against climate change.
- Encourages preservation, recycling, as well as energy and material saving programmes.
- Supports actions for the protection and preservation of the natural environment.
- Informs and raises awareness among employees and customers.
- Evaluates suppliers also taking into consideration environmental criteria.

13. Occupational safety

Occupational health and safety are top priorities for EKTER S.A., which aims at making work safe, at improving the quality of the employees' professional life and at preventing related risks.

In this context, EKTER S.A. carries out regular controls regarding, on the one

part, the adequacy and suitability of the existing safety means and on the other part, the respect of hygiene rules at work, while also having developed contingency plans.

Moreover, our Company undertakes to:

- comply with health and safety regulations
- ensure the creation of a safe and healthy working environment for the entire workforce by implementing occupational risk prevention programmes
- ensure the existence of protective infrastructure and equipment, as well as of emergency response techniques
- organise, based on project requirements, training courses in order to ensure that its employees are personally responsible for health and safety and that they are familiar with the relevant policies and safety procedures of the Company.

As staff members and associates of EKTER S.A., we all must observe and implement health and safety rules in our daily work activities, contribute to the prevention of accidents, participate in health and safety programmes organised by the competent services and immediately report to our Manager or the competent department of the Company any unsafe situations that may lead to accidents.

The achievement of appropriate safety conditions at work, and particularly on construction sites, always constitutes a responsibility also shared by the employees, who must behave in a responsible manner, thus not placing general safety at risk. Moreover, no company staff member or third party acting on the Company's behalf must be, while performing their tasks, under the influence of drugs, alcohol or other substances that impact their ability to work in a safe and efficient manner. The above restriction does not apply to events that are sponsored or approved by EKTER S.A., where alcoholic beverages may be served; in such cases, the moderate consumption thereof is allowed.

14. Code Compliance and Implementation – Reporting Code violations

The rules established under this Code are binding for all personnel members of EKTER S.A., as well as any third party acting on its behalf (subcontractors, suppliers, advisers, designers etc.). Therefore, each of these persons is required to have read and understood the content of this Code and fully comply with the legislation in force and the rules established by the Code.

EKTER S.A. reserves the right to impose special procedures and controls in relation to the professional records of each employee, subcontractor, supplier, contractor and any other person acting on its behalf in order to verify that each person/entity acts in accordance with the rules of this Code.

The employees and associates of EKTER S.A. are provided with many ways to address questions in relation to the implementation of the Code or report any violations thereof, without running the risk of any sanction against them as a result of reporting. More specifically:

- They are entitled to express their concerns and to report issues concerning the Code to their superiors. It is the responsibility of all senior executives to supervise the correct implementation and to provide guidance in relation to the procedure for addressing any form of Code violation.
- They are required to immediately report to the Manager/Director of their Department and to the Compliance Officer any issue/information related to a potential violation of the legislation in force and the representations established under this Code.

It is noted that EKTER S.A. takes all necessary measures to protect the identity of any employee that reports in good faith any potential violation of this Code.

All personnel members of EKTER S.A., as well as any third party acting on behalf of the company are required to fully cooperate for any control or investigation on potential violations of the Code rules. Said cooperation is required for the successful, fair and impartial examination of all complaints submitted regarding violations of the legislation in force and of this Code.

EKTER S.A. is entitled to take measures against employees who violate the law, this Code or the company policies. Any violation of this Code is examined in conjunction with the provisions of the Labour Regulation and may lead to disciplinary sanctions, in accordance with the prescribed procedures of the Company.

The Department and Project Managers of the company have increased responsibility regarding compliance with the Code and are required to create a working environment where each employee may ask for guidance on issues related to the implementation of the Code and report any Code violations. If a Manager knows that an employee committed or intends to commit an act prohibited by the Code and fails to report it, in accordance with the provisions of this Code, said Manager shall be held as equally responsible.

Any complaint/information shall be treated with full confidentiality. The natural person submitting the complaint/report may remain anonymous if they so desire.

Actions of retaliation against natural persons who report in good faith potential violations of this Code or of the legislation in force are strictly prohibited. EKTER S.A. shall not take nor tolerate any adverse measures taken against any natural or legal person who in a responsible manner and in good faith submits complaints or reports of violation of a law, rule, regulation, internal policy or this Code, or for their participation in any investigation for the violation of the above.

However, the Company reserves the right to take any measure it deems appropriate against an executive, employee or associate thereof when it is proven that the above person knowingly and intentionally defamed or provided false information to the Company or to third parties during a Code violation investigation. If any person makes a complaint in bad faith or with dishonest intentions (e.g. to disseminate false information or threaten others or with the intention of unfairly damaging the reputation of another person or of the Company), said person is subject to disciplinary action, which may also include employment contract termination.

15. Validity – Amendment of the Code

The Code of Conduct and Ethics is widely distributed to the personnel of EKTER S.A. and to its associates (subcontractors, contractors, suppliers, advisers, designers, etc.), while it is also made available to any person / organisation that cooperates with EKTER SA. The Code is available on our Company website (www.ekter.gr).

Through this disclosure, all interested parties have the opportunity to take knowledge of and assess the core values, rules and principles governing the operation of EKTER S.A.

The Code is implemented in parallel with and complements the Company's Internal Regulation, as approved by the Board of Directors.

Any amendment to this Code may be made only by decision of the Board of Directors and should be immediately communicated to the Company's personnel and to any third party / entity acting on behalf of EKTER S.A.