



# **CODE OF ETHICS AND CONDUCT**



**TABLE OF CONTENTS**

1. Introduction ..... 4

2. Our Vision, Values, and Mission ..... 4

3. The Basic Principles of the Code..... 6

3.1 Business Ethics ..... 6

3.2 Respect for Human Rights ..... 6

3.3 Observance of Legal and Ethical Rules ..... 7

3.4 Product Quality ..... 7

3.5 Competition..... 7

3.6 Avoiding Conflict of Interest..... 8

3.7 Risk Management..... 8

3.8 Accuracy & Completeness of Financial Information ..... 10

3.9 Protection of Corporate Assets ..... 10

3.10 Conducting all Transactions with Honesty ..... 11

3.11 Transparent and Legal Cooperation with Public Authorities ..... 11

3.12 Information Protection..... 11

3.14 Safety, Health, and Environmental Protection..... 13

3.15 Circular Economy and Climate Change ..... 14

3.16 Social Contribution ..... 14

4. Scope of Application..... 15

5. Reporting and Management of Code Violations ..... 15

## **1. Introduction**

The Plastika Kritis Group's Code of Ethics and Conduct in combination with the company's Regulation of Operation and the existing policies and procedures, forms the operating framework, the ethical standards, the principles, and the values that govern it.

The Code of Ethics and Conduct defines the conduct standards and the practices required from the staff of the Group's companies and are valid in each country in which the Group operates, along with the conditions and procedures concerning the customers, suppliers, and other associates of the Company.

The vision, values, and mission of the Group are described in the following chapters and the frameworks and behavioural patterns of all involved parties are developed.

## **2. Our Vision, Values, and Mission**

### Our vision

The vision of the Group is to produce products that are truly useful for its customers and help them improve their production offering its technology and quality, while operating with respect for the Interested Parties of the Group and the environment· to provide a high level of services for customers, suppliers and partners, and at the same time, systematically increase its share value, always ensuring the well-being of the people who work for the Group of Plastika Kritis.

The fundamental values of the Group are summarized in the following six points:

1. Creativity
2. Innovation – Technological pioneering
3. Quality
4. Environmental awareness
5. Respect for people
6. Meritocracy

Our Mission:

- To establish new business models through innovation and innovative thinking, helping our customers to pursue leading positioning in their market.
- To offer not just products but complete and innovative solutions that adapt to the needs and requirements of our customers
- To invest in our people, encouraging lifelong learning, initiative, and personal and collaborative achievement
- To operate at the same time on a local and on a worldwide level, serving a large number of companies around the world through our strategic geographical dispersion.
- To pursue profitability through organic growth and best use of strategic business opportunities.
- To achieve competitive prices through economies of scale, verticalization, and the integration of advanced technologies.
- To protect the environment and contribute to the local societies, where we act.
- To adapt to the ever-changing market conditions and trends.

### 3. The Basic Principles of the Code

#### 3.1 Business Ethics

The Group carries out its activities and makes decisions based on business ethics while implementing proper rules of operation, thus securing the interests of all interested parties within it. In particular, the Group implements modern corporate governance systems with clear definition of shareholders' rights, transparency and validity of information, communication with all interested parties, as well as independence in management. In this context, it expresses its commitment to the compliance with the following values:

- Integrity and responsibility of business decisions
- Responsible management of information and data protection
- Transparency and honesty of transactions
- Equality and respect for human rights and employment relationships and practices
- A healthy and safe working environment

In this direction the Group applies codes, policies, and procedures that are supervised by the Management and the Shareholders of the Company and increase the accountability and sense of responsibility towards its customers, society, and all the Interested Parties, and promotes practices with an emphasis on the establishment of high standards of conduct and adherence to the principles and values of the Group. In this framework, it is committed to compliance with the updated corporate governance standards and applies the principles of the Greek Corporate Governance Code for listed companies, as it was formulated by the Hellenic Corporate Governance Council (HCGC) in June 2021. The Group also records from customer sourcing the level of satisfaction and probable complaints.

#### 3.2 Respect for Human Rights

The Group is committed to zero tolerance for any form of discrimination based on race, religion, gender, nationality, age, disability, sexual orientation, etc., as well as incidents of harassment in the workplace and forced and child labor in the Parent Company and its Subsidiaries **and the supply chain**. To this end, it has adopted relevant policies to avoid the risk of human rights violations and is committed to continuously improving actions and controls with reference to human rights in its interactions with its suppliers or partners.

### **3.3 Observance of Legal and Ethical Rules**

The Group operates in many markets and regions worldwide and therefore, it operates in accordance with the laws, regulations, and practices of different countries.

A Constant goal is the responsible operation and activity based on the principles and policies of corporate governance dictated by Greek law, the Hellenic Capital Market Commission, and international practices, which constitute the entire corporate behaviour of listed companies on the Athens Stock Exchange. In this context, the staff of the Group is obliged to comply with all the applicable laws and regulations of the country in which the Group operates.

### **3.4 Product Quality**

The Group sets as a priority the quality, competitiveness of its products and the fulfilment of customers' requirements. For this purpose, it complies with each national legislation and safety rule regarding design and products production.

In this context it has managed to achieve the following competitive advantages:

- Product innovation and innovative solutions with 100 production lines
- Center of Research, Development, and Innovation
- Focus and verticalization
- Internationalization
- Differentiation
- Extroversion and sales in more than 90 countries

At the same time, it systematically monitors through a set of measurement indicators, the performance of the products and through regular quality controls, the maintenance of the standards, including those related to the health and safety of the customers and the end users. The products are controlled during all phases of production process and the Parent Company and the Group's Subsidiaries have adopted management systems and procedures according to various international standards (ISO 9001, ISO 45001 and CE) to ensure quality and customer service.

### **3.5 Competition**

The Group acts according to the principles of healthy competition and in accordance with

morality throughout the range of its business relationships. In this direction it does not seek to gain a competitive advantage in any unfair or abusive manner. In addition, all employees operate meritoriously, with procedures and standards, and according to the principles and rules that derive from fair competition.

### **3.6 Avoiding Conflict of Interest**

The Group has adopted in its Policies the frameworks and procedures provided by Law 4706/20 and the decisions of the Hellenic Capital Market Commission in avoidance of possible conflicts of interest with existing or potential customers, suppliers, or competitors and shareholders. Indicatively, the following situations are mentioned which can cause possible conflicts of interest and should be avoided:

- **Business Relations:** refers to transactions or dealings with a person, company, organization, or company in which an employee or a person from its close environment participates or facilitates the transaction and has a direct or indirect financial interest.
- **Private Activities:** concerns Group employees', who develop personal activities and relationships outside working hours, which by their own care should be brought in the Management's attention on time and should not be in conflict with the business interests of the Group. In particular, any activities that may adversely affect the employee's performance or create a conflict of interest with the business activities of the Group or Group associates should be avoided.
- **Social Participation:** refers to possible participation in associations, unions, or other social, political, or cultural institutions that serve purposes that may create a conflict of interest with the activities of the Group.

In case of doubts or queries regarding the existence or not of a conflict of interest, employees should follow the foreseen procedure for reporting and managing violations of the Code referred to in Chapter 5 hereof.

### **3.7 Risk Management**

The Plastika Kritis Group operates in an economic and social environment characterized by various financial and non-financial risks. Applying the Principle of Prevention, we have

developed policies and procedures that ensure effective risk management, thus upgrading and supporting the Company's internal control system. The risk management system applied in the Company and its Subsidiaries is based on the expansion of control fields and the introduction of security valves that make good use of the capability of preventive control. The most important categories of financial risks related to the operation of the Company are:

- Market risk (foreign exchange, interest rate fluctuation, product price fluctuation)
- Credit risk
- Liquidity risk
- Provision of guarantees

Areas that are considered high risk are monitored through the appropriate control systems. For instance, reference has been made to the existence of the Internal Rules of Operation, organizational charts with clear definitions of responsibilities, as well as safety valves through the internal control system. In addition, audits of all Company activities are carried out by the Internal Audit Department, and the results of these audits are presented to the Board by the Audit Committee.

#### **Significant non-financial risks**

The main categories of non-financial risks identified in the Company relate to health and safety at work, safety of facilities, and climate change, risks that could potentially directly or indirectly affect the smooth operation of the Company.

*Health and safety at work:* One of the most important risks associated with social and labor issues is the health and safety of human resources in all workplaces, especially in the production installations. Aiming towards systematic monitoring and continuous improvement of all the safety parameters related to these risks and elimination of injuries, we implement an integrated management system and accident reduction program while simultaneously investing in modern means and equipment and continuous staff training.

*Facility safety:* All necessary measures are taken to protect its production installations, equipment, resources, and property, as well as workers, from damage or injury such as natural disasters and fire. In this context, the Group carries out thorough inspections for the physical safety of the Group's installations.

### 3.8 Accuracy & Completeness of Financial Information

- The Group has established and applies **high standards and procedures for the accuracy and completeness of the financial information it provides**. Each financial element of the Group must be accurate, timely, and in accordance with the legislation of the country or countries to which it relates. The financial data and records constitute the basis for the management of the Group's business activity, as well as for the fulfillment of its obligations towards the shareholders of the Parent Company, the employees, the customers, the suppliers, and the regulatory authorities of the country. In order to ensure uniformity and two-way information to and from the Administration, the composition of the financial data based on the International Financial Reporting Standards (IFRS) as well as the presentation of the intermediate data but also of the budgets in a uniform way have been adopted.
- The Group's employees involved in the Financial and Business Transactions sector must accurately record the true nature of the transactions **and classify the transactions in the appropriate accounting period, division, and account, according to the applicable international or local accounting principles**.
- If it is necessary estimations and adjustments to be made in the financial reports and the respective records of a company of the Group, then they should be based on the best available information and supported by appropriate documentation, while the relevant records should be kept in writing. **Deliberate overestimation or underestimation during the preparation of the financial data included in the company reports constitutes violation of the Code.**

### 3.9 Protection of Corporate Assets

- The assets of the Group, including intellectual property rights as well as the reputation of the Company, are intended exclusively for corporate, and in no case for personal, use. **It is prohibited, therefore, the use of the Group's assets for personal gain or for the benefit of a third party other than the Group.**

Violation of the above prohibitions, mismanagement of the Group's assets, theft, or intentional misuse of its assets, **constitutes a violation of the Code and will result in the**

**taking of the prescribed measures and sanctions.**

### **3.10 Conducting all Transactions with Honesty**

- All staff of the Group is **obliged to treat with honesty and integrity the individuals and organizations with which it trades, avoiding the provision or receipt of any kind of gift or facility that may give the impression of influence exercise.** Exceptions only constitute of ceremonial gifts, which, however, should be within an acceptable context. Therefore, the judgment of the employee involved in this kind of «relationship» is crucial in this field because what is considered the «usual» and the «proper» ceremonial gift varies from country to country. For the giving and receiving of gifts provision has been made in a relevant policy approved by the Board, in which the acceptance and offer process is also determined.
- **In no case is the offer or acceptance of cash or equivalent or/and shares of the Parent Company** in the form of a gift to natural persons who have or wish to have transactions with the Company **permitted.**

**Finally, personal financial transactions with customers and suppliers, which could affect Group employees' impartiality of the performance ability of their duties are not allowed.**

### **3.11 Transparent and Legal Cooperation with Public Authorities**

- **The Group prohibits any kind of bribery of public or government officials in accordance with legislation.**

«Public and government officials» are the employees of any government or local prefecture and municipality around the world, even low-level employees, or employees of state-controlled entities. The term «public and government officials» also includes political parties and politicians or election candidates.

- **The bribery prohibition also applies to third parties acting on behalf of the Group,** including contractors and consultants cooperating with the Group.

### **3.12 Information Protection**

- **The disclosure of information required by law or that is necessary for professional reasons should be done ONLY by the competent departments and after having taken first the**

**appropriate actions to ensure its proper use.**

- It is the obligation of the Group's employees to protect all confidential information concerning the Group. Confidential information includes financial or technical data; plans for acquisitions or divestitures; new products; inventions or advertising campaigns; the personal data of employees, customers, suppliers, external partners, and of any third parties with whom we do business or who are interested in our products and services; important contracts; expansion plans; financial transactions; significant administrative changes; and information about the development of the Group.
- The information mentioned above is a Group asset, and no one can transfer it to third parties during his/her cooperation with, but also and after departing from the Group. This restriction also applies to the members of employee's circle of family and friends.
- Nevertheless, even within the Company or the Group, when an employee gives confidential information (i.e. privileged information that only a few people know about and concerns the promotion of a certain purpose) to colleagues, it should be limited to colleagues who really need to know that specific information for the performance of their duties. In case of any doubt, the employee should consult the Senior Managers.
- It is signaled that the purchase or sale of shares or securities based on confidential information or the disclosure of confidential information to third parties in order them to purchase or sale of shares or securities, is illegal and may lead to criminal prosecution.
- Every public announcement to both the regulatory authorities and the shareholders of the company is made only by the «Department of Shareholder Services and Corporate Announcements» of PLASTIKA KRITIS S.A. and must be complete, accurate, timely, and understandable.
- The approval of the Managing Directors of PLASTIKA KRITIS S.A. is necessary for any communication of Executives of the Group Companies with the mass media (local or international).
- At the same time, for the protection of the personal data of our customers, employees, and associates, the appropriate measures are taken in accordance with the provisions of the General Data Protection Regulation 679/2016 of the EU and the implementing internal law 4624/2019 as applicable. Also, in order to stay current with international standards and

good practices, the Group constantly adapts the procedures for the protection of personal data in all its activities.

### **3.14 Safety, Health, and Environmental Protection**

- The Group recognizes its responsibility to take all necessary measures for the protection of employees' health, the environment, and the natural resources of the countries in which it operates.
- The Group takes care to reduce the impact of its activities on the environment and is committed to integrating into the production process practices that are environmentally modern, responsible, and sustainable.
- The Group establishes its actions according to the principles of sustainable development and complies with existing legislation, the international guidelines, and standards, aiming for a balanced economic growth in harmony with the natural environment.
- The main priority of the Group is the protection of the health and safety of employees, consumers, customers, and communities in all areas in which the Group operates.
- The framework of effective management of health and safety issues is based on three pillars: 1) timely prevention and treatment through the implementation of prevention and treatment measures related to health and safety; 2) adequate information, training, and benefits to employees; 3) continuous improvement with repeated controls and inspections of the health and safety system.
- The Group has been implementing an Occupational Health and Safety Management System since 2003, certified according to the international standard ISO 45001 / OHSAS 18001, which is supplemented by the relevant Procedures manual, adopted by all production units of the Group and the Internal Safety Regulations of employees.
- Plastika Kritis S.A. has developed a digital platform that enhances the process recording and assessment of occupational risks in Greece as a means of improving occupational health and safety.
- The Group's policy requires the operation of its facilities and the conduct of works in accordance with the applicable legislation of each country in which they are based, the regulations and licenses on safety, hygiene, and the environment, including those governing control, transport, storage, and the disposal of controlled or non-controlled materials.

### **3.15 Circular Economy and Climate Change**

One of the most serious global issues is climate change and its alarming consequences, not only on corporate activity but also on the natural environment and society at large. At Plastika Kritis, we monitor international trends closely and take constantly new measures of mitigation of these risks, moving to new investments. We already operate a Renewable Energy Park, reducing the use of fossil fuels for the needs of our production process, while aiming to expand it further.

The Group places special emphasis on the application of the principles of circular economy, the responsible management of waste, the reduction of energy consumption, and the restriction of greenhouse gas emissions, that are related to its activities. In particular, it has adopted the principles of circular economy, from the raw materials supply and product design, incorporating practices based on the principles of reduction, reuse, and recycling, throughout the life cycle of its products. To mitigate the risks arising from climate change, the Group adapts its business model to reduce its carbon footprint and energy consumption, being in full compliance with environmental legislation and contributing to the achievement of the Sustainable Development Goals.

### **3.16 Social Contribution**

The Group supports social solidarity programs, assists organizations with recognized action of addressing social problems, and strengthens vulnerable social groups and individuals. It operates responsibly towards local communities and is in constant dialogue with local agencies and communities. A fundamental value of our Group is the practical support of society through a set of social actions aimed at four axes:

- Promoting social solidarity
- Strengthening the security & armed forces
- Health protection
- Promotion of sports, culture, and the environment

The aim of the Group is emerging as a valuable business entity for the communities wherein it operates, the promotion of innovation, and the effective management of essential social issues related to the business practices of the Group.

#### **4. Scope of Application**

The Code of Ethics and the related procedures and measures, apply to all staff, employees, executives and the top Management of Plastika Kritis S.A. and its subsidiaries.

We also encourage our contractors, suppliers, collaborators, consultants, and other business partners to adopt the principles contained in our Company's Code of Ethics and Conduct.

- **All employees of the Group should be informed and accept the text of the Code.** Also, **it must be sent electronically to every important partner of the Group**, who must then declare that it is received.
- In any case of queries regarding the content and the spirit of the Code, employees are obligated to discuss their concerns with their immediate supervisor, who will provide or refer them competently for the appropriate guidance.

#### **5. Reporting and Management of Code Violations**

##### **A. Report Violation of the Code**

In addition to the obligation for universal application of the Code, the employees of the Group are **obliged to report any violations of the Code**. The Group has the following communication channels, through which the Interested Parties can submit their reports to the Head of Regulatory Compliance:

1. Special mailing address: Plastika Kritis S.A., P Street, Industrial Zone, GR 714 08, Iraklion, GREECE
2. Electronic Contact Form available on the website of the Company PLASTIKA KRITIS
3. Personal contact with the person in charge of Regulatory Compliance

##### **B. Code Violation Management**

The Regulatory Compliance Department is responsible for managing the reports through the above communication channels based on the seriousness of the violations and the procedures provided by the competent bodies of the Company.

**Plastika Kritis Company reserves the right to make adjustments or modifications following the relevant decisions of the Board.**