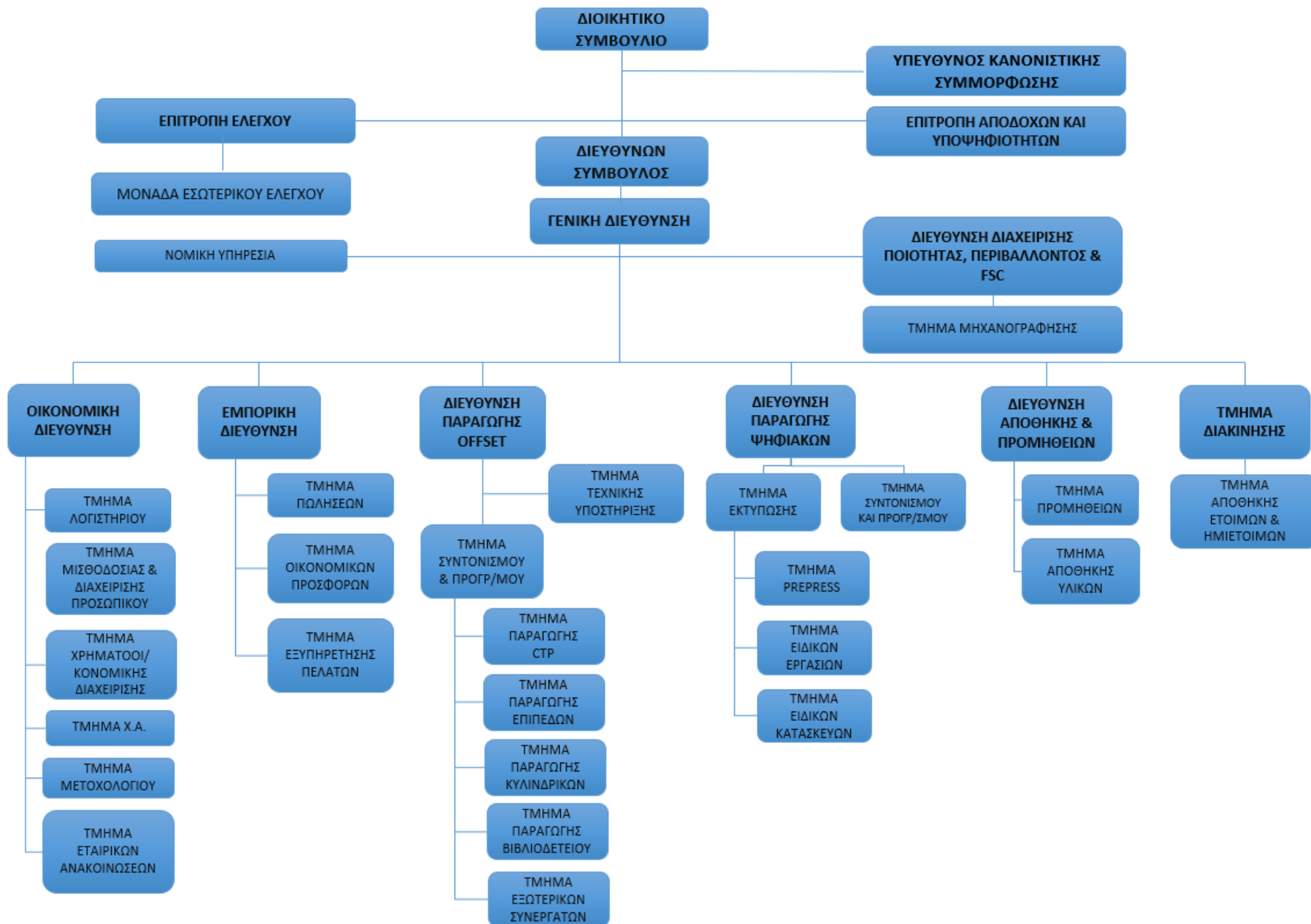


“HAIDEMENOS MODEL INDUSTRY OF GRAFIC ARTS S.A.”
OPERATION REGULATION

1. INTRODUCTION

- 1.1. This Operation Regulation (hereinafter referred to as: “OR”) of the societe anonyme with the corporate name “HAIDEMENOS MODEL INDUSTRY OF GRAFIC ARTS S.A.” (hereinafter referred to as: the "Company") has been established in accordance with the provisions of Law 4706/2020 about corporate governance, of Law 4548/2018 about societe anonyme and the legislation in general about the capital market and societe anonyme as well as in accordance with the provisions of the Company's articles of association.
- 1.2. The OR was approved and set in force with the decision of the Company's board of directors on 14.7.2021.
- 1.3. The OR is obligatorily applied by:
 - (a) The members of the Company’s board of directors,
 - (b) The Managing Director, the General Manager, the Directors and the Heads of Departments,
 - (c) The employees of the Company and all associates of the Company who provide their services by way of a contract for the provision of independent services or other kind of contract, if it is a lasting cooperation involving a particular relationship of trust or where their contract with the Company is expressly governed by the OR.
- 1.4. The OR is posted on the Company’s website and by this posting becomes known to the persons of paragraph 1.3., who are obliged to adhere to it.
- 1.5. The OR is continuously assessed for its compatibility with the valid legislation and its effectiveness. If it is considered to be necessary, the OR is amended by a decision of the Company's Board of Directors. The OR is interpreted and clarified, if necessary, by decisions of the Company’s Board of Directors.
- 1.6. The Company's organisational chart is as follows:



ΔΙΟΙΚΗΤΙΚΟ ΣΥΜΒΟΥΛΙΟ	BOARD OF DIRECTORS
ΕΠΙΤΡΟΠΗ ΕΛΕΓΧΟΥ	AUDIT COMMITTEE
ΜΟΝΑΔΑ ΕΣΩΤΕΡΙΚΟΥ ΕΛΕΓΧΟΥ	INTERNAL AUDIT UNIT
ΝΟΜΙΚΗ ΥΠΗΡΕΣΙΑ	LEGAL DEPARTMENT
ΔΙΕΥΘΥΝΩΝ ΣΥΜΒΟΥΛΟΣ	MANAGING DIRECTOR
ΓΕΝΙΚΗ ΔΙΕΥΘΥΝΣΗ	GENERAL DIVISION
ΥΠΕΥΘΥΝΟΣ ΚΑΝΟΝΙΣΤΙΚΗΣ ΣΥΜΜΟΡΦΩΣΗΣ	REGULATORY COMPLIANCE OFFICER
ΕΠΙΤΡΟΠΗ ΑΠΟΔΟΧΩΝ ΚΑΙ ΥΠΟΨΗΦΙΟΤΗΤΩΝ	REMUNERATION AND NOMINATIONS COMMITTEE
ΔΙΕΥΘΥΝΣΗ ΔΙΑΧΕΙΡΙΣΗΣ ΠΟΙΟΤΗΤΑΣ, ΠΕΡΙΒΑΛΛΟΝΤΟΣ & FSC	QUALITY MANAGEMENT, ENVIRONMENT & FSC DIVISION
ΤΜΗΜΑ ΜΗΧΑΝΟΓΡΑΦΗΣΗΣ	COMPUTERISATION DEPARTMENT
ΟΙΚΟΝΟΜΙΚΗ ΔΙΕΥΘΥΝΣΗ	FINANANCIAL DIVISION
ΤΜΗΜΑ ΛΟΓΙΣΤΗΡΙΟΥ	ACCOUNTING DEPARTMENT
ΤΜΗΜΑ ΜΙΣΘΟΔΟΣΙΑΣ & ΔΙΑΧΕΙΡΙΣΗΣ ΠΡΟΣΩΠΙΚΟΥ	PAYROLL AND PERSONNEL MANAGEMENT DEPARTMENT
ΤΜΗΜΑ ΧΡΗΜΑΤΟΟΙΚΟΝΟΜΙΚΗΣ ΔΙΑΧΕΙΡΙΣΗΣ	FINANCIAL MANAGEMENT DEPARTMENT
ΤΜΗΜΑ Χ.Α	F.S. DEPARTMENT
ΤΜΗΜΑ ΜΕΤΟΧΟΛΟΓΙΟΥ	SHARE REGISTER DEPARTMENT
ΤΜΗΜΑ ΕΤΑΙΡΙΚΩΝ ΑΝΑΚΟΙΝΩΣΕΩΝ	CORPORATE ANNOUNCEMENTS DEPARTMENT
ΕΜΠΟΡΙΚΗ ΔΙΕΥΘΥΝΣΗ	COMMERCIAL DIVISION
ΤΜΗΜΑ ΠΩΛΗΣΕΩΝ	SALES DEPARTMENT
ΤΜΗΜΑ ΟΙΚΟΝΟΜΙΚΩΝ ΠΡΟΣΦΟΡΩΝ	FINANCIAL OFFER DEPARTMENT
ΤΜΗΜΑ ΕΞΥΠΗΡΕΤΗΣΗΣ ΠΕΛΑΤΩΝ	CLIENT SERVICE DEPARTMENT
ΔΙΕΥΘΥΝΣΗ ΠΑΡΑΓΩΓΗΣ OFFSET	OFFSET PRODUCTION DIVISION
ΤΜΗΜΑ ΣΥΝΤΟΝΙΣΜΟΥ & ΠΡΟΓΡ/ΜΟΥ	COORDINATION & PROGRAMMING DEPARTMENT
ΤΜΗΜΑ ΠΑΡΑΓΩΓΗΣ CTP	CTP PRODUCTION DEPARTMENT
ΤΜΗΜΑ ΠΑΡΑΓΩΓΗΣ ΕΠΙΠΕΔΩΒ	FLAT PRINTING PRODUCTION DEPARTMENT
ΤΜΗΜΑ ΠΑΡΑΓΩΓΗΣ ΚΥΛΙΝΔΡΙΚΩΝ	CYLINDER PRINTING PRODUCTION DEPARTMENT
ΤΜΗΜΑ ΠΑΡΑΓΩΓΗΣ ΒΙΒΛΙΟΔΕΤΕΙΟΥ	BOOK-BINDING PRODUCTION DEPARTMENT
ΤΜΗΜΑ ΕΞΩΤΕΡΙΚΩΝ ΣΥΝΕΡΓΑΤΩΝ	EXTERNAL ASSOCIATES DEPARTMENT
ΤΜΗΜΑ ΤΕΧΝΙΚΗΣ ΥΠΟΣΤΗΡΙΞΗΣ	TECHNICAL SUPPORT DEPARTMENT
ΔΙΕΥΘΥΝΣΗ ΠΑΡΑΓΩΓΗΣ ΨΗΦΙΑΚΩΝ	DIGITAL PRODUCTION DIVISION
ΤΜΗΜΑ ΕΚΤΥΠΩΣΗΣ	PRINTING DEPARTMENT
ΤΜΗΜΑ ΣΥΝΤΟΝΙΣΜΟΥ ΚΑΙ ΠΡΟΓΡ/ΣΜΟΥ	COORDINATION AND PROGRAMMING DEPARTMENT
ΤΜΗΜΑ REPRESS	REPRESS DEPARTMENT
ΤΜΗΜΑ ΕΙΔΙΚΩΝ ΕΡΓΑΣΙΩΝ	SPECIAL OPERATIONS DEPARTMENT
ΤΜΗΜΑ ΕΙΔΙΚΩΝ ΚΑΤΑΣΚΕΥΩΝ	SPECIAL MANUFACTURING DEPARTMENT

ΔΙΕΥΘΥΝΣΗ ΑΠΟΘΗΚΗΣ & ΠΡΟΜΗΘΕΙΩΝ	STORAGE & PROCUREMENT DIVISION
ΤΜΗΜΑ ΠΡΟΜΗΘΕΙΩΝ	PROCUREMENT DEPARTMENT
ΤΜΗΜΑ ΑΠΟΘΗΚΗΣ ΥΛΙΚΩΝ	MATERIAL STORAGE DEPARTMENT
ΤΜΗΜΑ ΔΙΑΚΙΝΗΣΗΣ	MOVEMENT DEPARTMENT
ΤΜΗΜΑ ΑΠΟΘΗΚΗΣ ΕΤΟΙΜΩΝ & ΗΜΙΕΤΟΙΜΩΝ	READY & SEMI-READY ITEM STORAGE DEPARTMENT

2. CONTENT OF THE OR

The following are defined in the OR:

- (a) The arrangement of the Company's departments and committees and their subject-areas.
- (b) The main characteristics of the internal audit system.
- (c) The responsibilities of executive and non-executive members, as well as of independent members of the Board of Directors.
- (d) The procedure of recruiting and evaluating the performance of the Company's senior managerial executives.
- (e) The training policy of the members of the Board of Directors, the managerial executives and other executives of the Company.
- (f) The procedures for compliance with Regulation (EU) 596/2014.
- (g) The procedure for disclosing any dependency relationships in accordance with Article 9 of Law 4706/2020 among the independent non-executive members of the Board of Directors and of persons that have close ties with them.
- (h) The procedure for compliance with the obligations arising from Articles 99 to 101 of Law 4548/2018 in relation to transactions with connected parties.
- (i) The policies and procedures for preventing and dealing with conflicts of interest.
- (j) The Company's policies and procedures for complying with the legislative and regulative provisions that regulate its organisation and operation, as well as its activities.
- (k) The Company's procedure for the management of privileged information and for the proper information of the public, in accordance with the provisions of Regulation (EU) 596/2014.
- (l) The policy and procedure for undertaking a periodic assessment of the internal audit system.
- (m) The basic policies, principles and procedures for the Company's operation.

3. THE COMPANY'S ORGANISATIONAL STRUCTURE & PRINCIPLES

3.1. *General Principles*

- 3.1.1. The Company's organisational structure is shown in the above chart and explained in detail below.
- 3.1.2. The Company is organised into one General Division and six sub-divisions, which are charged with distinct responsibilities and a specific scope of activities. The number, scope and responsibilities of the General Division and of the sub-divisions are determined by a decision of the Board of Directors or of the Managing Director.
- 3.1.3. It is the Company's philosophy to directly and effectively satisfy the diverse needs of its clients, which is achieved through the rapid response of its organisational structure to the needs of the market at any time.
- 3.1.4. Trust-based collaboration between the Company's executives and employees is considered to be essential for the efficient operation of the Company and for effectively addressing external challenges.
- 3.1.5. All the executives and employees of the Company must keep all information relating to the Company and the scope of its tasks that they become aware of confidential.
- 3.1.6. Executives and employees of the Company must avoid any conflict of interest with the Company and report any such conflict of interest, even if it is not certain, directly to the Company.
- 3.1.7. The responsibilities of the individual departments that are described below are not mentioned in an exclusive manner with regard to the work content of the executives and employees involved in them and tasks or duties may be assigned to these executives and employees which, although they do not arise directly from their cycle of responsibilities, are nevertheless functionally or conceptually integrated into that cycle.

3.2. *Description of the Company's Divisions*

3.2.1. General Division

The general division is responsible for the implementation and monitoring of the Company's strategy and policies and manages all the individual sub-divisions which it also coordinates. The General Division is also responsible for the daily monitoring of the Company's tasks. The General Division reports to the Company's Board of Directors.

3.2.2. Quality Management, Environment & FSC Division

This division has the following responsibilities:

- It is responsible for the development, implementation and certification of the Quality Management, Environment and FSC system, which covers all the activities of the Company.
- In this context, it develops written operating procedures for the different Departments of the Company and creates the organisational framework imposed by the international set of standards ISO 9001 and ISO 14001 for the development, operation and certification of Quality and Environment Management Systems.
- It also arranges for internal checks of the adherence to the Quality and Environment Management Systems to be undertaken.

3.2.3. Financial Division

This division has the following responsibilities:

- It coordinates and directs the shaping of financial programmes and participates in the establishment of the more general strategic and operational and investment programmes.
- It programmes improvements to the procedures for achieving the targets and the proper operation of the financial department.
- It coordinates the management of raising capital and concluding loans for the purpose of securing the required liquidity, minimising the cost of loan capital and maximising the return on deposits.
- It takes care that the Company's financial position is correctly and accurately depicted by the lawful application of suitable accounting principles, policies and practices, in accordance with the provisions of the applicable accounting and tax laws and the Company's accounting principles.
- It coordinates and checks the timely compiling of regular and extraordinary financial statements and reports, to ensure that the Company's management and managerial executives are correctly and promptly informed of the Company's progress in the implementation of budgets, the results and the Company's financial position.
- It ensures the timely compiling and issue of all statutory annual and periodic financial statements, in order to protect the interests and public image of the

Company and to inform the investment public in a timely and appropriate manner.

3.2.4. Commercial Division

This division has the following responsibilities:

- It is responsible for organising the sales and the promotion and advertising of the Company's products.
- It provides advice with the aim of maximising returns on investments and the reduction of entrepreneurial risk.
- It evaluates the cooperations which aim to expand the Company's activities and to penetrate new markets.
- It devises programmes, proposes the taking of measures and develops those skills that are necessary to strengthen the position of the Company in a competitive environment.
- It carries out contacts and negotiations with third parties and evaluates them.
- It finds and evaluates new business opportunities as well as carrying out commercial, financial and technical analyses.
- It provides advisory services to the heads of departments on matters relating to the effective organisation of the Company.
- It negotiates and concludes contracts with clients through executives who are specifically authorised by a decision of the Board of Directors and in accordance with everything defined in the relevant decision of the Board of Directors.
- It implements the sales strategy defined by the Company's management and steers the salesmen in accordance with this.
- It gives guidance on the credit and pricing policy and checks their implementation.
- It ensures the proper functioning of its departments.
- It sets sales targets per salesman and reports on their achievement to the General Manager.
- It is informed of and addresses any customer complaints or non-conformities that may occur.

- It recommends proposals to the General Manager for the better operation and development of its departments.
- It programmes frequent meetings with the department heads.
- It checks customer satisfaction.
- It processes statistical sales data and gives reports to the General Manager at regular intervals.
- It is informed of the actions of competitors with the aim of renewing the corporate image of the products and conducting promotional actions, where necessary, with the aim of strengthening the Company's competitive position.
- It receives information and directly cooperates with the person responsible for credit control and management of collectables in relation to the solvency of clients and is informed of the credit limits of clients.
- It monitors and decides the participation of the Company in public tenders.
- It collaborates directly with the Storage and Procurements Manager for paper stocks.

3.2.5. Offset Production Division

This division has the following responsibilities:

- It checks and monitors production programming in accordance with orders received through a computerised system so that the delivery time of the tasks is adhered to.
- It supervises, reviews, motivates, evaluates and trains the employees who staff it.
- It participates in daily meetings with the production departments.
- It makes recommendations to the General Manager for the better operation and development of its departments.
- It is responsible for the proper operation of the production facilities and for the full exploitation of their capabilities by monitoring the maintenance programmes and production procedure as a whole.
- It cooperates with the competent departments with the aim of seeking effective production methods with a cost reduction.

- It reports any incidences of non-compliance as well as customer complaints which may arise to the Quality Management, Environment and FSC Manager.
- It ensures the full and substantive employment of production personnel, the cooperation of the different departments and coordinates quality control programmes at all phases of the production procedure.
- It cooperates with the safety technician and the occupational physician to ensure the safety and hygiene of the workers in the production areas.
- It supervises the safety of the facilities.
- It cooperates with the Commercial Department to resolve any problems during the implementation of orders.
- It processes statistical production data and gives reports to the General Manager at regular intervals.
- It cooperates directly with the Storage and Procurements Manager for stocks of primary and secondary materials.
- It has contacts and proceeds to negotiations with suppliers of mechanical equipment and their evaluation in cooperation with the General Manager.
- It provides advice with the aim of maximising returns on investments and the reduction of entrepreneurial risk.

3.2.6. Storage & Procurements Division

This division has the following responsibilities:

- It monitors and controls the safety stock of materials.
- It controls the internal movement of materials to production.
- It ensures the proper operation of the departments and makes recommendations to the General Manager, to the Production Manager and to the Commercial Manager as regards the quantities of materials that the production will require.
- It supervises, checks, evaluates, motivates and trains the personnel of the departments.
- It undertakes market research for new suppliers and new materials and makes recommendations to the General Manager.
- It coordinates the quality control programmes.

- It supervises safety and hygiene at the storage facilities.
- It keeps statistical data for its departments and reports to the General Manager at regular intervals.
- It selects suitable suppliers and monitors the implementation of orders.
- It evaluates suppliers on the basis of the best quality, price, payment terms and, more generally, the return benefit that can be obtained from each agreement.

3.2.7. Digital Production Division

This division has the following responsibilities:

- It reviews and monitors production programming in accordance with the orders, so that the delivery deadline of the projects is kept.
- It supervises, reviews, motivates, evaluates and trains the employees who staff it.
- It cooperates with the competent departments with the aim of seeking effective production methods with a cost reduction.
- It reports any incidences of non-compliance as well as customer complaints which may arise to the Quality Management, Environment and FSC Manager.
- It ensures the full and substantive employment of production personnel, the cooperation of the different departments and coordinates quality control programmes at all phases of the production procedure.
- It cooperates with the safety technician and the occupational physician to ensure the safety and hygiene of the workers in the production areas.
- It supervises the safety of the facilities.
- It cooperates with the commercial department to resolve any problems related to the implementation of orders.
- It provides advice with the aim of maximising returns on investments and the reduction of entrepreneurial risk.
- It recommends proposals to the General Manager for the better operation and development of its departments.

- It evaluates the suppliers and external associates on the basis of the best quality, price, payment terms and, more generally, the return benefit that can be obtained from each agreement.
- It cooperates with the commercial department for better programming and to resolve any problems during the implementation of orders.
- It addresses, settles, and resolves any problems with external associates.

3.2.8. Legal Department

The legal department is staffed by external lawyers and Legal Consultants and reports to the General Management. Its responsibilities include:

- To provide legal advice and other legal services to the Company.
- To monitor the legitimacy of the Company and the compiling of minutes of the Board of Directors and the General Meeting.
- To conduct all types of trials.
- To monitor the legislative developments and developments in case law and to inform the company of matters of interest to it.
- To compile and review contracts of all kinds with third parties and extra judicial statements.

4. ADMINISTRATION OF THE COMPANY

4.1. Board of Directors

4.1.1. The Board of Directors is the Company's supreme administrative body. It has the administration responsibility (management and disposal) of the corporate property and the representation of the Company in order to strengthen its long-term financial value and to protect the general corporate interest. Its tasks include decision-making as well as the responsibility of exercising full and effective control over all the activities of the Company within the limits of the law and the provisions of its articles of association.

4.1.2. As provided by law, the Board of Directors is composed of executive and non-executive members. The number of independent non-executive members must not be less than one third of the total number of members of the Board of Directors and not less than two. The status of members as executive and non-executive members is determined by the Board of Directors itself, while the independent members are appointed by the General Meeting.

- 4.1.3. The members of the Board of Directors must devote sufficient time to the performance of their duties. The members of the board of directors may hold up to three positions on the Boards of Directors of other non-connected limited companies. The non-executive members of the Board of Directors do not participate in boards of more than five (5) listed companies, and in the case of the chairman of more than three (3).
- 4.1.4. The executive members deal with day-to-day matters of administration of the Company and the supervision of the implementation of the decisions of the Board of Directors and, among other persons, are responsible for the implementation of the strategy as determined by the Board of Directors and shall consult at regular intervals with the non-executive members of the Board of Directors in relation to the suitability of the strategy being implemented.
- 4.1.5. The non-executive members of the Board of Directors, including independent non-executive members, have the following obligations in particular: a) they monitor and examine the strategy of the Company and its implementation, as well as the achievement of its targets, b) ensure the effective supervision of executive members, including the monitoring and control of their performance, c) examine and express opinions on proposals submitted by the executive members, based on existing information.
- 4.1.6. Independent non-executive members shall mean the members of the Board of Directors who fulfil the terms and conditions of independence set out in Article 9 of Law 4706/2020. The independent non-executive members of the Board of Directors may each separately or jointly submit separate statements and reports to the general meeting of the Company.
- 4.1.6. In the event the chairman of the Board of Directors is chosen by the non-executive members, one of the independent non-executive members is appointed either as vice-chairman or as Senior Independent Director. The independent non-executive Vice-chairman or Senior Independent Director, as the case may be, has the following responsibilities: to support the Chairman, act as a liaison between the Chairman and the members of the Board of Directors, coordinate the independent non-executive members and lead the Chairman's assessment.
- 4.1.7. The basic responsibilities of the Board of Directors include:
- (a) Deciding upon the Company's general strategy, the acquisition of any business or the proposal to merge the Company with another business. which are subject to the final approval of the General Meeting of the Company.

- (b) The adoption and implementation of the general strategy on the basis of the recommendations and proposals of the General Manager and the Company's directors.
- (c) The management and disposal of the corporate property and the representation of the Company judicially and extrajudicially.
- (d) The preparation of the Company's annual budget and business plan, the setting and achievement of its effectiveness targets and, in general, the monitoring of the Company's progress.
- (e) The responsibility for full and effective control over all the activities of the Company.
- (f) The monitoring of the adherence to and effectiveness of the corporate governance principles under which the Company operates and to undertake any necessary changes, if so required.
- (g) The determination of the strategy and management of the Company's entrepreneurial risks
- (h) The selection, utilisation and development of the Company's managerial executives and the determination of the policy of their remuneration.
- (i) The determination of the accounting principles that the Company follows.
- (j) The compiling of annual reports, in which the Company's transactions with its connected companies are mentioned in detail.

4.1.8. The rules governing the representation of the Company are determined by special decisions of the Board of Directors.

4.1.9. Any remuneration of the members of the Board of Directors shall be borne by the Company as it is part of the Company's remuneration policy as this has been approved by the General Meeting.

4.1.10. The Board of Directors is supported by a capable, specialised and experienced corporate secretary so as to comply with the internal procedures and policies, the relevant laws and regulations and to operate effectively and efficiently. In consultation with the chairman, the corporate secretary is responsible for ensuring the immediate, clear and complete information of the Board of Directors, the integration of new members, the organisation of General Meetings, facilitating shareholder communication with the Board of Directors and facilitating communication between the Board of Directors and senior management executives.

4.2. *Managing Director – Responsibilities*

4.2.1. The Managing Director, who is appointed by decision of the Board of Directors, replaces the Board of Directors and is responsible for the implementation of the Company's strategic objectives and policy. He/she cares for and ensures the proper and effective operation of the Company and sets out the Company's guidelines. He/she is responsible, without prejudice to the general competence of the Board of Directors, *inter alia*, for:

- (a) Making strategic decisions regarding the development / approval of business programmes, the proposal / approval of large investments, the determination of the Company's organisational structure, the safeguarding of the Company's decisions and the provision of information to the Board of Directors on Company matters.
- (b) Making / participating in major business decisions (e.g. commercial, production, procurement, human resources), defining risk management policies, risk assessment and implementing measures and procedures to address them effectively, the supervision and guidance of all divisions in accordance with the Company's organisational chart, cooperation with the Audit Committee and the Internal Audit Unit to improve the Company's operation.
- (c) The specification of the budgetary targets, the proposal to set annual performance targets and the achievement of the objectives of the annual budgets, the supervision of the Company's financial management and the progress of its operations, the control of cash flows, undertaking performance review meetings, and the audit of the Company's financial, technical and human resources' performance.
- (d) The recruitment and guidance of Company executives, the establishment / definition of performance, promotion and executive development assessment guidelines, as well as the remuneration system, the coordination of senior executives and the supervision and assurance of their performance for the Company's proper operation.

4.2.2. The managing director participates in and reports to the Company's Board of Directors.

5. INTERNAL AUDIT

5.1. Audit Committee

5.1.1. The Audit Committee consists of at least three members, the majority of whom must be independent within the meaning of Article 9 of Law 4706/2020. The

Audit Committee consists of a committee of the Board of Directors comprised of non-executive members of it.

5.1.2. The Audit Committee operates in accordance with Article 44 of Law 4449/2017, as amended by Article 74 of Law 4706/2020, Articles 10, 15 & 16 of Law 4706/2020, Regulation (EU) 537/2014, the Greek Corporate Governance Code, that has voluntarily been adopted by the Company, its rules of operation and the provisions of this OR. The members of the Company's Audit Committee, their attributes and their curricula vitae are posted on the Company's website. The Audit Committee has specific responsibilities and competences with regard to the supervision of the regular audit, the financial reporting procedure, the internal audit system, regulatory compliance and risk management and the supervision of the Internal Audit Unit. The operation of the Audit Committee is described in detail in the Operation Regulation of the Audit Committee, which is approved by the Audit Committee and posted on the Company's website. The Audit Committee uses any resources it deems appropriate to fulfil its purpose, including services provided by external consultants.

5.2. *Internal Audit Unit*

5.2.1. The Company has an Internal Audit Unit, which is an independent organisational unit within the Company, to monitor and improve the Company's functions and policies with regard to its Internal Audit System. The Internal Audit Unit operates in accordance with Articles 15 & 16 of Law 4706/2020, the Greek Corporate Governance Code, which has voluntarily been adopted by the Company, its internal operation regulation and the provisions of this OR of the Company. The internal auditors perform their duties in accordance with the principles of independence, objectivity and confidentiality, comply with applicable internal audit standards, applicable law and the Company's policies and procedures.

5.2.2. The Head of the Internal Audit Unit is appointed by the Company's Board of Directors following a proposal by the Audit Committee, is a full-time and exclusive employee who is personally and operationally independent and objective in the performance of his/her duties and has suitable knowledge and relevant professional experience. He/she is administratively subject to the Managing Director and operationally to the Audit Committee. As Head of the Internal Audit Unit, he/she may not be a member of the Board of Directors or a member with voting rights on permanent committees of the Company and have close ties with anyone who holds one of the above capacities in the Company or in a company of the Group.

- 5.2.3. The Company informs the Securities and Exchange Commission of any change of the Head of the Internal Audit Unit, submitting the minutes of the relevant Board of Directors' meeting within a time limit of twenty days of this change.
- 5.2.4. The operation, organisation and responsibilities of the Internal Audit Unit are described analytically in its operation regulation, and are approved by the Company's Board of Directors after a proposal by the Audit Committee.

6. REMUNERATION & NOMINATIONS COMMITTEE

- 6.1. The Company has a single Remuneration & Nominations Committee. The Remuneration & Nominations Committee consists of at least three members and consists of non-executive members of the Board of Directors. At least two (2) members are independent non-executive members. The independent non-executive members shall constitute the majority of the members of the Remuneration & Nominations Committee. An independent non-executive member is appointed as Chairman of the Remuneration & Nominations Committee. The members of the Remuneration & Nominations Committee, their attributes and their curricula vitae are posted on the Company's website.
- 6.2. The Company's Remuneration & Nominations Committee is set up for the purpose of supporting the Board of Directors in fulfilling its obligations to the shareholders, in relation to ensuring that the indication of candidates for the Board of Directors is made on merit and on the basis of objective criteria, so as to ensure the smooth succession of its members with the aim of promoting the long-term interests of the Company. In the context of its role, the Remuneration & Nominations Committee shall identify and propose persons suitable for membership of the Board of Directors to the Board of Directors on the basis of a procedure laid down in its Operation Regulation. For the selection of candidates, it takes the factors and criteria established by the Company in accordance with its eligibility policy into account.
- 6.3. Adhering to Articles 109 to 112 of Law 4548/2018, the Remuneration and Nominations Committee:
- (a) Puts forward proposals to the Board of Directors in relation to the remuneration policy that is submitted for approval to the General Meeting in accordance with paragraph 2 of Article 110 of Law 4548/2018.
 - (b) Makes proposals to the Board of Directors in relation to the remuneration of persons falling within the scope of application of the remuneration policy in accordance with Article 110 of Law 4548/2018, and in relation to

the remuneration of the Company's managerial executives, in particular the Head of the Internal Audit Unit.

- (c) It examines the information contained in the final draft of the annual remunerations report, providing its opinion to the Board of Directors, before submitting the report to the General Meeting, in accordance with Article 112 of Law 4548/2018.
- (d) It identifies and proposes to the Board of Directors persons suitable for membership of the Board of Directors on the basis of a procedure provided for in its Operation Regulation, taking into account the factors and criteria set by the Company, in accordance with the eligibility policy it adopts.

7. REGULATORY COMPLIANCE OFFICER

- 7.1. The Company's Regulatory Compliance Officer operates in accordance with Law 4706/2020.
- 7.2. The task of the Regulatory Compliance Officer is to establish and implement suitable and up-to-date policies and procedures with the aim of ensuring the Company's timely, complete and lasting compliance with the regulatory framework applying at any time and to check the degree to which this is achieved. In order to establish the relevant policies and procedures, the complexity and nature of the Company's activities, including the development and promotion of new products and business practices, have been assessed.
- 7.3. The Regulatory Compliance Officer reports operationally to the Board of Directors and administratively to the managing director, has the possibility of access to all required sources of information and has sufficient knowledge and experience.

8. INTERNAL AUDIT SYSTEM

8.1. *Meaning & main characteristics*

- 8.1.1. The Internal Audit System (IAS) is integrated into the Company's corporate governance system and is defined as being the set of internal audit mechanisms including risk management, internal audit and regulatory compliance. The IAS continuously covers all activities of the Company and contributes to its safe and efficient operation. The effectiveness of the IAS requires a periodic reassessment of the nature and extent of the risks to which the Company is exposed, with the aim of managing these risks in a framework preferred by the Company.

- 8.1.2. The IAS includes the following sectors: • the control environment • , risk management • , control activities • , information and communication • and monitoring.
- 8.1.3. The control environment is the cornerstone of the IAS. It influences the manner of preparation of business strategies and objectives, the structure of corporate processes, as well as the process of recognition, evaluation and overall management of risks. It also influences the design and operation of control activities, information and communication systems and the monitoring mechanisms of the IAS. The control environment is essentially the sum of several individual elements which determine the overall organisation and management and operation of the Company.
- 8.1.4. Risk management: The adequacy and effectiveness of the Company's IAS shall be based on: a) The kind and extent of the risks it faces, b) the extent and categories of risks which the Board of Directors considers to be acceptable to underwrite, c) the likelihood of the above risks arising, d) the ability of the Company to reduce the risks, if they materialise, and e) the cost of operating certain control activities. A prerequisite of risk management is the determination of objective goals. On this basis, important events that may affect them must be identified, the associated risks assessed, and the Company should decide to address them.
- 8.1.5. Control activities are the policies and procedures that ensure that the Board of Director's decisions in relation to risk management which threaten the achievement of the Company's goals are implemented. Control activities include approvals, authorisations, confirmations, overviews of operational performance, etc. Each control activity that is applied is connected to the existence of a relevant risk. When choosing between alternative control activities of a similar level of effectiveness, the selection is made with the criterion of the cost-benefit relationship.
- 8.1.6. Information & communication: An element of the IAS is the way the Company ensures that information is recognised, collected and distributed at such a time and in such a way as to enable its executives to fulfil their duties effectively. This flow can be in all directions, inside (vertically and horizontally) and outside the Company. All critical matters in terms of both business organisation and operation, as well as adherence to legality, can reach the level of the Board of Directors, which is responsible for adopting the appropriate measures.
- 8.1.7. Monitoring: The monitoring of the IAS consists of a continuous assessment of the existence and operation of the components of the internal audit framework. This is achieved through a combination of lasting supervisory activities but also

individual appraisals. The detected deficiencies of the IAS are communicated to the Board of Directors. The periodic assessment of the IAS is carried out in particular as regards the adequacy and effectiveness of the financial reporting, on an individual and consolidated basis, as far as risk management and regulatory compliance are concerned.

8.2. *Policy and periodic assessment of the internal audit system*

- 8.2.1. The Company has a specific periodic assessment procedure for the IAS by an objective, independent, proven-to-be-certified and sufficiently experienced assessor in accordance with Articles 14 and 9 of Law 4706/2020, as specified by decision 1/891/30.9.2020 of the Board of Directors of the Securities and Exchange Commission. The Company also has a specific proposal, selection and approval procedure for the IAS assessor. The periodic evaluation procedure of the IAS specifies the subjects of assessment, the form and the recipients of the evaluation report, the periodicity, the assignment procedure to the independent assessor and any subsidiary companies included in the evaluation.
- 8.2.2. The evaluation subjects of the IAS are the following: • control environment, • risk management • control activities • information and communication • monitoring.
- 8.2.3. The periodic assessment of the IAS is carried out in particular as to the adequacy and effectiveness of the financial and non-financial reporting on an individual and consolidated basis, in terms of risk management and regulatory compliance, in accordance with recognised evaluation and internal control standards and the implementation of the corporate governance provisions of the current legal framework. The assessment of the adequacy of the IAS is carried out by an independent person who has proven relevant professional experience in accordance with best international practices (indicatively, the International Auditing Standards, the International Professional Standards Framework for Internal Audit and the Internal Audit System of the COSO Committee).
- 8.2.4. The Board of Directors is responsible for the adequate and effective operation of the corporate governance system and the IAS in accordance with Articles 1 to 24 of Law 4706/2020. In this context, the Board of Directors defines the periodic evaluation of the IAS every three (3) years with a first reference period in the period 17.7.2021 to 31.12.2021. In each case, the assessment of the IAS forms part of the overall assessment of the Company's corporate governance system, in accordance with Article 4, paragraph 1, of Law 4706/2020. The Board of Directors is obliged to cooperate with the Securities and Exchange Commission if the latter requires a case-by-case assessment of the company's IAS.

- 8.2.5. The IAS assessment assignment procedure starts with an instruction from the Board of Directors to the managing director to collect three written offers from assessors who fulfil the relevant legal requirements. The assessors may be legal or natural persons. The Managing Director then recommends the suitable assessor to the Audit Committee based on the aforementioned regulatory criteria but also the technical and financial criteria. The Audit Committee checks the recommendation of the Managing Director and in its turn makes a recommendation to the Company's Board of Directors, which shall ultimately be responsible for the selection of the assessor and the assignment of the relevant task. In the context of ensuring independence and objectivity, the evaluation of the IAS may not be carried out by the same assessor for a third consecutive evaluation.
- 8.2.6. Upon completion of his/her evaluation, the IAS's assessor submits a report on the evaluation results, which includes both a summary of his/her observations and an analysis of it, the time of its preparation, the reference date of the evaluation and the period covered by the evaluation report, which starts from the day following the reference date of the previous assessment. The summary shall include the assessor's conclusion, depending on the assessment standards invoked regarding the adequacy and effectiveness of the IAS. It also includes the most significant findings of the evaluation, the risks and consequences emanating from these and the response of the Company's management to them, including the related action plans with clear and realistic timelines. The analytical report includes all the findings of the evaluation with the relevant analyses. The Audit Committee and the Board of Directors of the Company are the report's recipients. The Company submits the summary of the report without delay to the Securities and Exchange Commission, and in any event within three (3) months of the report's reference date, and, if necessary, the whole of it. The annual Corporate Governance Statement includes a relevant report on the results of the Evaluation Report.

9. CORPORATE ANNOUNCEMENTS & SHAREHOLDER SERVICES UNIT

- 9.1. The Company has a Corporate Announcements & Shareholder Services Unit, which operates as a single unit.
- 9.2. The Corporate Announcements & Shareholder Services Unit makes the necessary announcements that refer to regulated information, in accordance with the provisions of Law 3556/2007, as well as corporate events in accordance with the provisions of Law 4548/2018, with the aim of informing shareholders or beneficiaries of other securities of the Company. The corporate announcements unit is responsible for compliance by the Company with the obligations provided for in

Article 17 of Regulation (EU) 596/2014, as regards disclosure of privileged information, and other applicable provisions.

9.3. The Corporate Announcements & Shareholder Services Unit provides every facility and information to shareholders on the exercise of their rights.

10. PROCEDURE FOR RECRUITMENT AND EVALUATION OF THE PERFORMANCE OF THE SENIOR MANAGERIAL EXECUTIVES

10.1. A relevant request for recruitment is made by the direct heads of the managerial executives to be recruited, which is forwarded to the Human Resources department.

10.2. The Human Resources department then initially examines the possibility of meeting the needs from the existing executive staff. If something like this is not possible, it proceeds to the publishing of a notice in daily and/or periodical printed media and/or on the Internet or in another suitable manner at its free discretion.

10.3. If there is a need to recruit executives with specialised qualifications, knowledge and experience, these are determined by the direct heads of the managerial executives to be recruited and candidates may be sought through specialised consultants at the responsibility of the personnel management department.

10.4. The responsible manager and the general manager participate in the procedure of evaluating the candidates so that the most suitable one can be selected, the final selection being made by the Managing Director.

10.5. The assessment of the performance of the senior executives is carried out periodically and coordinated by the Human Resources department. The Managing Director is responsible for the evaluation. After the evaluation, systematic monitoring of the performance of the senior managerial executives during the following year in terms of the achievement of the programmed targets is required.

10.6. The evaluation procedure is based on the following principles:

- (a) Participation and consent of the party being assessed in his/her evaluation procedure.
- (b) Vocational guidance on the action result of the party being assessed.
- (c) Impartial and objective evaluation.
- (d) Prior knowledge of the evaluation criteria and open information procedure.
- (e) The possibility of the party being evaluated to raise objections.
- (f) The assessor is always the direct manager of the person being evaluated.

11. PROCEDURE FOR MONITORING TRANSACTIONS OF CONNECTED PERSONS & PROCEDURE FOR THE MANAGEMENT OF PRIVILEGED INFORMATION IN ACCORDANCE WITH REGULATION (EU) 596/2014.

- 11.1. Under Regulation (EU) 596/2014, the Company is obliged to monitor the transactions carried out by: a) the persons that it employs, either on an employment contract or otherwise, who have access to privileged information, and b) persons exercising managerial duties in the Company in securities of the Company and those having close ties with those persons. The Company informs the persons exercising managerial duties in writing when taking up their duties of the obligation under the law to disclose such transactions. The persons exercising managerial duties in turn inform the persons with whom they have close ties in writing of their legal obligation to disclose transactions.
- 11.2. In order to monitor the transactions of these persons, the following actions are taken:
- (a) The company's FS department draws up a list of persons exercising managerial duties in the Company and of the persons having close ties with them, which is updated immediately in the event of a change of its details and submitted to the Securities and Exchange Commission. These persons (obliged persons) submit the notifications of their transactions in writing to the Company's FS department within the following business day after their establishment.
 - (b) The company's FS department draws up a list of persons that the Company employs either by employment contract or otherwise and who have access to privileged information, which is updated immediately in the event of a change of its details, in order to be made available to the Securities and Exchange Commission whenever this is requested. The monitoring of the transactions in the Company's shares by the persons that the Company employs either by employment contract or otherwise and who have access to privileged information is carried out by the Company's FS department and, in the case of a transaction which is subject to the disclosure rules being detected, it informs the corporate announcements unit, which immediately makes the investing public aware of the privileged information relating to the Company. The Internal Audit Unit shall undertake checks to verify compliance with capital market legislation in relation to transactions by obliged persons.

- 11.3. The persons who receive confidential information due to their responsibilities should not disclose it to unauthorised executives or to third parties and are to take all measures necessary to protect the confidentiality of the information in order to prevent it from being disclosed, its dissemination to third parties and its illegal use for carrying out transactions. Also, these persons must exercise all due diligence to avoid the conduct of transactions suspected of being undertaken by illegal methods. Where there are indications of such transactions, these persons must inform the manager to whom they refer, or the General Manager or the Managing Director or the Board of Directors and the Company's Internal Audit Unit, without delay.
- 11.4. The Internal Audit Unit shall check the flow of information between the Company's divisions and departments to ensure that the legislation about market abuse is adhered to.
- 11.5. The Company is obliged to request information about other financial activities of the persons exercising managerial duties in the Company, which are related to the Company and its main customers or suppliers. Upon taking up their duties, the above persons declare in writing any personal and/or business relationship they or their relations have with any third parties that the Company cooperates with (customers, suppliers, consultants, etc.) and undertake the responsibility to notify the Human Resources department, which keeps a relevant record of any activity of theirs which may cause conflicts of interest in the future. In the event of the discovery of such a conflict of interest, the Board of Directors is informed without delay, which decides on appropriate measures to remedy the conflict of interest.
- 11.6. In accordance with Regulation (EU) 596/2014, notifications of transactions by persons exercising managerial duties in the Company are submitted directly by the obliged persons to the Securities and Exchange Commission. In particular, persons exercising managerial duties in the Company, as well as the persons who have close ties with them, are obliged to notify the Securities and Exchange Commission directly, while at the same time the obligation remains to notify the Company of the transactions they undertake on their own account in the Company's securities. The persons who exercise managerial duties are obliged to inform the persons with whom they have close ties of those obligations, in writing. The obliged persons have the obligation to notify transactions for each transaction after completing transactions for a total amount of 5,000 EUROS within a calendar year. The 5,000 EUROS threshold shall be calculated by adding all the transactions without off setting any amount. Pursuant to Regulation 596/2014, persons exercising managerial duties in the Company and those having a close tie with these persons are required to notify the Company of the transactions they carry

out on their own account in respect of shares issued by the Company or derivatives or other financial instruments, which are connected to them.

- 11.7. Through the Corporate Announcements Unit, the Company will further receive the updates and publicises all necessary information relating to significant changes in the participations in the voting rights of the obliged persons in accordance with the provisions of Law 3556/2007, and under the above Law. In particular, the Company publicises all the information referred to in paragraph 1 of Article 14 of Law 3556/2007, and Article 11 of the above Law, which it receives from the obliged persons, immediately upon receipt of the information in question and, in any event, no later than two (2) trading days from the date of the above receipt. The Company is informed in writing quickly and in every instance no later than three (3) trading days after the date on which the shareholder or person referred to in Article 10 of Law 3556/2007: (a) is informed of the acquisition or disposal or ability to exercise voting rights, or (b) taking the circumstances in question into account, it should have been informed of the acquisition or disposal or exercise of voting rights, irrespective of the date on which the acquisition or disposal takes place or the voting rights can be exercised, or (c) is informed of an event referred to in paragraph 3 of Article 9 of Law 3556/2007.
- 11.8. The Corporate Announcements & Shareholder Services Unit has the responsibility of adhering to the above, and of informing those responsible.
- 11.9. The Corporate Announcements & Shareholder Services Unit is responsible for informing the obliged persons in accordance with the law, so that obliged persons are aware of the content of the above obligations.
- 11.10. The obliged persons must notify the Company in writing of all their transactions in relation to securities of the Company or of associated businesses in accordance with the above by submitting a notification of the relevant transactions to the Corporate Announcements & Shareholder Services unit within the following business day after their establishment.

12. PROCEDURE FOR REPORTING THE EXISTENCE OF DEPENDENCY RELATIONSHIPS IN ACCORDANCE ARTICLE 9 OF LAW 4706/2020

- 12.1. In compliance with the provisions of Article 9 of Law 4706/2020, the Company has a procedure for disclosure of any relationship of dependency between the members of the Board of Directors and persons having close ties with them.
- 12.2. The persons proposed as being independent members of the board of directors submit, before their election to the Company, a solemn statement that there are no facts relating to them which remove their independence within the meaning of

Article 9 of Law 4706/2020, while simultaneously undertaking to inform the Company immediately in the event of any relevant change to their personal circumstances or to the personal circumstances of the people in their close family surroundings.

12.3. The Board of Directors is responsible for taking the necessary measures to ensure the above compliance as well as for the necessary actions in the event that it is established that the conditions of independence laid down by law are not being fulfilled. The conditions are re-examined annually, and the relevant finding is included in the annual financial management report.

12.3. The Board of Directors informs the remuneration and nominations committee in order to initiate the procedure for the election of a new independent non-executive member of the Board of Directors, if this becomes necessary.

13. PROCEDURE FOR COMPLIANCE WITH THE OBLIGATIONS EMANATING FROM ARTICLES 99 - 101 OF LAW 4548/2018

13.1. The persons who are characterised as being connected parties in accordance with Article 99 of Law 4548/2018 in conjunction with IAS 24 and the other relevant IAS/IFRS standards must, before the relevant transaction is drawn up, inform the board of directors of the Company in writing explaining the basis for their status as a related party, in order to comply with the procedure for drawing up the transaction provided for in Articles 99 – 101 of Law 4548/2018. In the event of a transaction being drawn in breach of Articles 99 – 101 of Law 4548/2018, the transaction is invalid.

13.2. The above obligation to provide information exists even if the related party is of the opinion that the intended transaction falls under an exception to the provisions of the law.

13.3. Every member of the Board of Directors and every employee of the Company should immediately inform the Board of Directors if he/she becomes aware of any attempt to conclude or to establish a transaction with a connected party without observing the legal procedure.

14. POLICIES AND PROCEDURES FOR PREVENTING AND ADDRESSING CONFLICTS OF INTEREST

14.1. The members of the Board of Directors, any third person to whom they have assigned their competences, and the executives of the Company are obliged:

- a) Not to pursue any interests of their own that are contrary to the interests of the Company.

- b) To promptly and adequately disclose their own interests, which may arise from transactions of the Company which fall within their duties, and any conflict of interest with those of the Company or its connected businesses which arise in exercise of their duties to the Board of Directors. To disclose every conflict of interest of the Company with the interests of the persons of paragraph 2 of Article 99 of Law 4548/2018, if they relate to those persons. An adequate disclosure shall be considered to be one which includes a description of both the transaction and of the own interests.
- c) To maintain strict confidentiality of the Company's affairs and business secrets, which have been made known to them by virtue of their status.

14.2. A member of the Board of Directors is not entitled to vote on matters in which there is a conflict of interest of his with the Company or of persons with whom he is connected by a relationship subject to paragraph 2 of Article 99 of Law 4548/2018. In such cases, the decisions shall be taken by the other members of the Board of Directors, and in the event that many members are similarly unable to vote to the extent that the others do not form a quorum, the other members of the Board of Directors, irrespective of their number, should convene a General Meeting for the exclusive purpose of taking this decision.

15. EXECUTIVE TRAINING POLICY

- 15.1. The Company arranges for the lasting training and education of the members of the Board of Directors, senior executives and all persons involved in internal control, risk management, regulatory compliance and information systems.
- 15.2. In this context, the Company ensures that these persons regularly attend training seminars and vocational training related to their duties and to the Company's business activity.

16. POLICIES AND PROCEDURES FOR COMPLIANCE BY THE COMPANY WITH LEGISLATIVE AND REGULATORY PROVISIONS

- 16.1. In compliance with Article 13 of Law 4706/2020 about organisational arrangements in the context of applying an effective corporate governance system, there is a Regulatory Compliance officer in the Company.
- 16.2. The main responsibility of the Regulatory Compliance Officer is to monitor the adoption and implementation of appropriate and up-to-date policies and procedures with the aim of achieving full and lasting compliance of the Company with the regulatory framework applying at any time in a timely manner, and for there to be a complete picture at any time of the extent to which this is achieved. The

Regulatory Compliance Officer is responsible for the observance of the annual planning of checks in relation to the Company's regulatory compliance and in particular in the control areas indicated by the annual planning of the Internal Audit Unit.

17. KEY POLICIES, PRINCIPLES AND PROCEDURES FOR THE COMPANY'S OPERATION.

17.1. General Principle

The Company makes every effort to ensure that, in the exercise of its business activity, it and its executives / employees / associates comply fully with the applicable law which governs all aspects of both the Company's business and its corporate operation. The following corporate policy sectors are indicative and are developed specifically because of their particular sensitivity and corporate social responsibility, which the Company has developed, without this meaning in any way that the Company has not adopted corresponding regulatory compliance policies and practices in its other action sectors.

17.2. Policy on environmental protection matters

17.2.1. Protecting and respecting the environment is a top priority for the Company. Within the context of the perspective for sustainable development and environmental protection, the Company takes the following measures among others:

- In accordance with the requirements of the ISO 14001 standards and the adherence to existing environmental legislation and agreements and commitments that the Company has undertaken voluntarily.
- To assess the impact on the environment and to record the potential risks of the Company's activity.
- To educate, raise awareness and inform its staff in a manner adapted to their respective duties and needs.
- For the proper maintenance and renewal of its mechanical equipment.
- To encourage the Company's associates (contractors, suppliers, customers) to respect its policy as to the environment.

17.2.2. It should be noted that the Company has modern engineering equipment which meets the highest international standards for environmental protection and is certified FSC Chain of Custody (chain of supervision in accordance with the standards of the Forest Sustainable Management Organisation FSC) in its factories.

17.2.3. The Company also monitors the emissions of all its machines by checking their compatibility with the limits laid down in the legislation in force through specialists.

17.3. Policy on labour matters

17.3.1. A cornerstone for the operation of the Company is the labour factor, i.e., its workforce and the employees' relations with the Company's management.

17.3.2. Not only does the Company ensure that it adheres fully to the existing labour legislation, but it is trying with all means available to constantly improve working conditions which are at the highest level, so that workers are satisfied. A characteristic of the Company's policy is also the fact of long-term industrial relations, which have developed into relationships of trust.

17.3.3. The Company's management makes the safety and protection of the interests and rights of workers and their personality and dignity a top priority. In this context, it strengthens the workers' freedom of expression and facilitates direct communication of employees with authorised members of the Company's management on all matters of concern to them in order for them to receive timely responses and solutions.

17.3.4. The Company strongly condemns child labour and forced labour, all forms of discrimination at work, as well as violence and harassment at work, including sexual harassment.

17.3.5. In the context of the occupational hygiene and safety policy, the Company takes the following measures among others:

- To control and apply suitable means of safety at work.
- To strengthen the corporate and occupational culture in matters of safety.
- For the education and training of workers in matters of hygiene and safety; the occupational risk from their work is made known to them and they are encouraged to comply fully with the hygiene and safety rules.
- For the location, assessment and immediate response to potential risks and to establish a preventive action plan and improve working conditions in the business.
- For the systematic inspection of tasks, the organisation and adherence to hygiene and safety procedures with the aim of ensuring that they are continuously updated and improved.

- For the maintenance and monitoring of the safe operation of means and facilities.

17.3.6. The Company ensures the application of diversity criteria as to the senior managerial executives with specific representation targets per gender.

17.4. Policy in matters of corruption

17.4.1. The Company is particularly sensitive to bribery and corruption, whether it concerns executives / employees / workers / associates of the Company or third-party businesses with which the Company has commercial or other relationships.

17.4.2. The Company constantly informs its executives and workers on the rules of good business behaviour that they should follow, and to avoid any act that might even give rise to suspicion of corruption or unfair practices.

17.4.3. The Company monitors the following business practices so that illegal behaviour which may affect the Company's reputation in transactions and overall social image is detected in a timely manner.

17.5. Policy on matters of personal data protection

17.5.1. The Company is particularly sensitive to personal data protection issues, it takes appropriate organisational and technical measures to ensure that the processing of personal data is lawful and adopts rules for the assessment and reassessment of the measures that it applies to comply with the relevant legislation in force.

17.5.2. The Company applies a Privacy Policy to protect the individual against the processing of data of a personal character.

17.6. Policy as to the adherence of rules of conduct by cooperating businesses

17.6.1. In the context of its cooperation with suppliers and other businesses (hereinafter referred to as: "Associates"), the Company is particularly sensitive to the adherence to the latest key rules of conduct, particularly in matters relating to environmental protection, the workers and addressing corruption.

17.6.2. Associates must adhere to the legislation applying at any time in its totality, to regulations of all kinds and industrial standards, and, indeed, to the highest degree of compliance possible.

17.6.3. The workers of the Associates should be treated with respect and dignity and work under fully hygienic and safe conditions. The Associates must adhere to the age limits of employees provided by the labour legislation, and in any case should not employ children or profit from child labour in any way. The Associates must

not force workers in any way (e.g., with violence, unlawful threats, illegal withholding of documents) to provide work against their will, including work beyond the legal time limit. The Associates must not discriminate on the basis of gender, origin, religion, marital status or ideological, political, sexual or other worker preferences.

- 17.6.4. The Associates must adhere strictly to the environmental protection legislation by adopting all appropriate environmental protection measures and standards, depending on the type of activity performed by them, as well as effective monitoring mechanisms for their business activities with the aim of locating and addressing possible risks to the environment in time. Among other things, the associates must see to it that waste is reduced and stored and managed safely.
- 17.6.5. The Associates should refrain from any act of bribery and corruption in general and should educate and supervise their staff in respect of legality and commercial ethics.
- 17.6.6. If the Company discovers a breach of the foregoing, the Company will terminate the cooperation with the Associate.