

CODE OF ETHICS AND BUSINESS CONDUCT

“HAIDEMENOS MODEL INDUSTRY OF GRAPHIC ARTS S.A.”

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Article 1. GENERAL

The Code of Ethics and Business Conduct (“the Code”) constitutes summary of the principles of the SOCIETE ANONYME under the corporate name “**HAIDEMENOS SA**” (The Company).

Relations of the Company with third parties transacting, as well as the relations between employees and the Company, are governed by the context of standard principles and values.

Non-negotiable abidance by the context of values and compliance with valid legislation consist term and guarantee of impeccable, from the view of ethics, conduct. The Company follows good business practices based on transparency, integrity and reliability. The purpose of the code is the definition of commitments and conduct rules of the Company as to principles and rules that have to construe any field of activity, as well as the relations between the Company employees and all interested parties. The Code constitutes a tool of guidance in order to achieve proper professional conduct, ethics and integrity.

All members of the personnel are required to know the Code and abide by the said strictly and unavoidably. The term “employee” hereto shall refer to all persons occupied by the company without any exception under any work relation.

In addition, all members of the personnel in any potential case of violation of the Code shall have to act as defined in Policy of Reports and Complaints Management.

Whereas the Code is not possible to cover any possible aspect of everyday business activity, employees have, pursuant to orders of common sense and critical thinking, to apply the principles of Code in regard to any cases of doubt and pursue guidance by their Supervisors.

Article 2. COMPLIANCE WITH THE LAWS

The basic principle of the Company is the respect and compliance with laws in force, provisions and regulations of the State. It constitutes personal responsibility of all employees to be informed as to laws and regulations related to their labour and duties and furthermore they ought to avoid any action which could involve the Company and themselves in a certain illegal act.

Article 3. PROTECTION OF ASSETS

Property of the Company constitute not only the material or tangible and obvious property assets and goods (i.e. buildings, vehicles, furniture, merchandise, raw material, computers, rest of equipment, appliances etc.) yet even other intangible property records (i.e. engineering studies, ideas, knowhow, royalties of industrial ownership or copyright etc.) which, employees evolve during their work. In the said are concluded the lists of suppliers, customers and other information of the market as well as any other records and information, which employees have access to, as a result of their work. Any employee has to protect property assets of the company from any kind of damage (i.e. loss, theft, misuse or destruction). "Damage" is considered any act that may damage smooth every day operation or reputation of the Company and negatively affect other involved parties directly or indirectly to interests thereof.

In particular:

Employees and members of the Board of Directors have to use cash available and assets of the Company solely for business activities of the Company.

Assets of the Company are not allowed to be used for personal benefit of employees or be available to third parties for use non-related to operation of the Company. Misuse or theft of assets of the Company may cause penalties including dismissal, and may constitute cause for civil or penal prosecution.

Any employee ought to be informed for corporate instructions and circulars concerning execution of their duties and define competencies of any position in relevance to acquisition, use or disposal of assets as well as rules, referring to hierarchy and competencies of any position.

Article 4. DATA RELIABILITY AND INTERNAL AUDITS

Employees ought to responsibly draw up documents, reports and in general official notes as well as supervise completeness and rightfulness of information rendered to the Management of the Company or third parties. Written reports and the rest of records as well as electronic systems data have to be stored and remain in files pursuant to the policies of information systems of the Company.

Management of the Company is responsible for installation and operation of appropriate methods and internal control systems which have to secure effectively, timely detection of any errors and immediate



solution of, in order to secure effectiveness and efficiency of operations, reliability of financial reports and compliance with applied laws and regulations.

Article 5. USE OF MEDIA
(Telephones, email, internet)

Phone systems (including mobile phones rendering) as well as rights to access the Internet or email of the Company constitute property thereof and therefore, have to be used for communications related to work. Use of equipment is allowed to employees of the Company exclusively and solely following grant and use of a sole combination- user name and password. User name and password using is forbidden by any other employee as well as the use of any illegal activity.

Use of Internet is not allowed for attending entertainment videos, online games, Facebook and other social media applications. Authorized by the company officers visiting Internet for purposes relevant to the objects of the position they serve are exempted.

Installation, use and creation of any other software is not allowed (applications, games etc.) from users apart from those which are installed by the Company.

Installation of new programs has to be made exclusively following communication with the Department of Computerization.

Email granted by the Company to its employees constitutes means of communication for official reasons, and notification thereof in websites on Internet is forbidden for purposes apart from those of the Company. "Suspicious" mails are the most common way of spreading viruses on the Internet. Therefore, files with promises of gifts, announcements of lottery etc. and any other mail foreign to corporate purposes are not to be opened in no case whatsoever.

Article 6. CONFIDENTIALITY OF INFORMATION – SECRECY

Morals of the Company impose securing of confidentiality of sensitive information (such as: financial data, trading strategies, investing records etc.) concerning the Company and parties transacting with the Company as well. Employees bear responsibility to secure confidentiality of the said information and not to proceed during execution of their duties to acts that can lead to disclaimer of significant and confidential corporate



records information / data. Employees ought to abide by confidentiality, protect any inside information to their possession and make use of the said only during or after solution of their employment contract by any manner whatsoever without any time limitations. The Company applies mechanisms for the protection and appropriate briefing of shareholders and investment community in relation to information that could affect stock market value of the Company and proceeds timely to the required publications. Any person (employee or third party) who takes notice of the said information is forbidden from using the said for carrying out stock market transactions as to shares of the Company. In addition, it is forbidden to announce inside information to third parties outside the Company.

Article 7. COMPUTER SOFTWARE USE

The policy of the Company is to use lawful and licensed software programs and forbids their illegal copying. Employees use licensed computer software (i.e. access to computer hardware, computer text editor, spreadsheets, etc.)

Article 8 . EMPLOYMENT

Company's policy is to operate under fair and legal procedures of workforce without making any discretions regarding age, sex, gender, colour, national origin, religion, health, love preferences political or ideological views, or other characteristics of employees, protected by laws and regulations, Employees are required to comply with all laws and regulations and carry out their work based on the above principle of non-discretion.

The purpose of the company is fair and justified treatment of all employees as well as improvement and development thereof.

It is also the policy of the Company to respect confidential treatment of personal information.

The Company respects and applies health and safety rules of work.

Neither smoking nor use of alcohol is allowed in all interior areas of the corporate buildings of the Company. Employees have to show diligence when carrying out of their duties, protect and promote corporate interests by any legal manner and dedicate their competences and experience for the promotion and development of corporate affair, interests and rights.

Employees are required to come to the Company at a specific time, not be absent without a leave or unjustifiably, carry out their work and duties assigned to them and obligations of their position with diligence and conscientiousness pursuant to the instructions of the Company and their supervisors and not be occupied during their working hours with other affairs irrelevant to their work and especially when the said : a) are opposed to corporate interests , b) cause even slight decrease to the effectiveness of the employee or his colleagues and /or, (c) challenge the conscientious performance of their duties.

Every employee has to be fully informed as to corporate instructions and circulars, concerning his duties and defining competencies of each position as well as the rules referring to hierarchy and competences of each position. Occupation of employees under any other capacity or office, in a competitive business or cooperator of the Company, without previous written permission thereof is forbidden.

Article 9. CONFLICT OF INTERESTS

Every employee is subject to loyalty to the Company. Employees ought to avoid situations by which their personal interest is opposed to their obligations for servicing corporate interests and not to proceed either for their own account or for a third party's account to any competitive activity. Potential situations of conflict of interests are possible to ensue on decision taking of the Company (i.e. associates selection, hiring, supplies/commissions). It is also possible to ensue on employees' relations or transaction conclusions outside the Company (i.e. other professional relations, relations with Public Authorities personal transactions with customers or suppliers of the Company, confidential information use). The said potential or real situations of interests conflict are notified by any employee, timely, to the Head of his/her department and Responsible party of Regulatory Compliance, so that sufficient measures to be taken for management or avoidance of conflict of interest.

As far members of the Board of Directors are concerned the said have to follow laws and corporate rules as well as Interest Conflict policy, in order to achieve non-hindered and unbiased execution of their work.

Article 10. TRANSACTIONS WITH CUSTOMERS, SUPPLIERS AND COMPETITORS

Our relations to customers and suppliers are governed by trust, mutual respect and integrity aiming at long lasting cooperation and mutual satisfaction of both side interests. Each transaction with a customer and supplier is made fairly, responsibly and by full transparency with no intention of deceit or exploitation thereof and pursuant to policies and procedures of the company. The Company takes measures so that national and international business transactions follow the legislation in force, with all valid regulations of commerce and

limitations in force as imposed each time by international or national principles (United Nations Organization, European Union) in countries, legal entities (companies, organizations, etc.) and natural persons.

The Company operates and develops its business activity pursuant to the law on the protection of free competition (competitive markets). It relies securing of its competitive position exclusively on factors related to innovation, reliability and provision of high quality products and services and does not aim at acquiring a competitive benefit through unfair commercial practices or immoral actions. It does not participate in illegal practices, such as price agreements or business practices with competitors, does not exchange confidential information with competitors, does not agree to purchase shares with competitors and does not exploit any powerful position thereof, in the markets.

Article 11. SPONSORSHIP POLICY

The Company proceeds to grants and donations to organizations, associations, foundations or administrative services in the context of Corporate Social Responsibility in order to support education, sports, culture, social welfare, science or other related actions with public benefit purpose. Donations should not give the impression that they aim at securing commercial benefits. Any donation is governed by full transparency and abidance by legality and morals. To this end files of documentation and management are kept.

Article 12. BRIBERY AND CORRUPTION

The Company does not allow bribery, illegal payments and unfair practices in no case whatsoever.

Employees and members of the Board of Directors during exercise of their duties must not accept gift payments or other services by third parties (i.e. customers, suppliers, competitors, any other employees etc.) in order to promote or attract affairs, referring to their duties.

The meaning of gift includes any offer of an object or service by money value, including indicatively loans, discounts, entertainment, travelling, board and lodging in low prices, as well education by third parties.

Article 13. RELATIONS WITH INVESTORS AND MEDIA

The Company is enlisted in the Athens Stock Market and is governed by regulations defining the time of substantial information publication. Therefore, communication with media is possible to affect the sensitive issue of shares price or in general the image of the Company. Competent departments of the Company are responsible for statements, which shall be made by specifically authorized persons.

Competent department for the definition of the content of announcements and responses to Media is the Department of Corporate Announcements of the Unit of Shareholders Service and Corporate Announcements which coordinates upon consultation with the Management of the Company the necessary actions each time. Competent department for the service of Shareholders and Investors is the Department of Shareholders Service of the Unit of Shareholders Service and Corporate Announcements. If a certain analyst or investor is interested in information relevant to the Company, it should be referred to the Unit of Shareholders Service and Corporate Announcements.

Article 14. REVISION OF THE CODE

The Officer of Regulatory Compliance of the Company and the Officer of Human Resources regularly evaluate sufficiency of the Code and guide Management and workers of the Company for their effective application. Management and handling of any violations of the Code constitute competence of the Department of Human Resources with the support of the Regulatory Compliance Officer pursuant to the legislation in force and current regulations governing the Company. Violation of the Code may lead to penalties corresponding to the kind of violation pursuant to legislation in force.

The Code is revised by decision of the Board of Directors of the Company.