



Code of Conduct

At a glance

## top management message

Dear colleagues,

Our principles, our beliefs, our corporate culture, our business ethics and primarily our voluntary ethical commitments are crucial pillars of the operations of KEKROPS and remain unchanged over time.

This Code reflects and reinforces these principles and creates an agreed and transparent operating and behavioral framework, which should be respected by all of us, our partners, subcontractors and suppliers. The Code shall remind each one of us, but also help every new employee or our partners to have a better understanding, of the business environment in which each of us has to adopt. The Code also describes cooperation principles that everyone in KEKROPS has to implement.

The acceptance and implementation of the COC, namely the Code of Conduct of KEKROPS, applies over time and ensures the creation of a working environment which promotes values such as mutual trust, transparency, collaboration, recognition, integrity, equal opportunities, progress and motivation and which distinguishes skills and personality traits of every human, helps overcome personal and interpersonal difficulties, promotes innovation of thoughts and actions based on achievements and creates a feeling of security and meritocracy for all employees in a modern working environment.

We should all spend time to read and understand the Code and be conscientious ambassadors of its principles and values. The support and contribution of everyone is crucial for KEKROPS and its employees to continue in this path and for the achievement of Company's goals. Top Management of KEKROPS has an axiomatic and fundamental point of view: Our power is in our people and value system.

## introduction

### why do we need a Code of Conduct

The Code of Conduct constitutes the basic framework of principles and values that should characterize the professional behavior of all the people of KEKROPS, following relevant BoD decisions for its adoption, and governs our relationships with our colleagues, our customers, our suppliers and our partners. Everyone, at any working level, from the construction site to the Top Management, is responsible to respect, be familiar and comply with the Code.

The implementation of the Code ensures:

- Transparency in the relations and activities of KEKROPS.
- Satisfaction of customers' expectations, of the people using our projects and of the wider society that benefits from our projects and services.
- The creation of a safe, healthy and friendly working environment for all our employees with respect to human rights and values.
- The creation of relations of respect and mutual trust between the Company and its suppliers and partners.
- The respect for the environment and that the Company operates in the context of sustainable development.
- The protection of all assets and copyrights of KEKROPS.
- The compliance of KEKROPS with the current regulatory framework.
- The adoption of practices and behaviors in accordance with the voluntary commitments governing KEKROPS from the beginning of its establishment.

The Code protects all of us from adopting or suffering from improper or illegal behavior and helps us realize that such attitudes endanger not only human values but also the interests of KEKROPS, its employees and our society.

The content of the Code is consistent with the general principles of International Regulations and Agreements as well as the international standards ISO 9001, ISO 14001, ISO 45001, ISO 37301, ISO 37001, ISO 50001 and SA 8000.

The Code, as well as all of its updates or amendments, is approved and put into force by the Board of Directors of KEKROPS and it is available on the Company's website.

## how do we use the Code

The Code is a point of reference for all of us, in order to:

- Guide us on how to practice our profession.
- Set the framework for the establishment of more detailed rules and behaviors.
- Be used to answer dilemmas and questions raised during our work.
- Help us when we have doubts about how to act.
- Trigger the establishment of Company's principles and culture.

The Code applies to all sectors of KEKROPS, and is considered in all partnerships and joint ventures in which the Company participates.

The content of the Code contains the minimum requirements to be applied and is supported by policies, procedures and other internal documents (e.g. regulations, instructions) of KEKROPS, which are equally binding all of us.

## our obligations



### Employees

All employees have to:

- Read and understand the Code and the relevant Policies and Procedures.
- Operate, work and behave according to the Principles and Values of the Code.
- Immediately inform the Compliance Officer in case of deviations from the Code which draw their attention.
- Participate in trainings for the Code of Conduct.



### Managers

All managers have to:

- Manage their personnel according to the Principles and Values of the Code.
- Monitor the implementation of the Code by all personnel, suppliers and partners.
- Encourage our personnel to actively participate in trainings related to the issues of the Code.
- Encourage employees, suppliers and partners to report deviations or questions related to the Code.
- Create a working environment that meets the requirements of the Code.
- Ensure that Policies, Procedures and all documents of KEKROPS comply with the Code.



### Partners and Suppliers

All partners and suppliers of KEKROPS are informed about the Code of Conduct and its content and are encouraged to:

- Read and understand the Code.

- Accept the Code before starting their cooperation with KEKROPS.
- Include a separate article in their contract with KEKROPS.
- Operate and work in accordance with the Principles and Values of the Code.
- Immediately inform the Compliance Officer in case of deviations from the Code which draw their attention.

Compliance with the Regulatory Framework in each country in which KEKROPS operates, is a self-evident obligation for us, our partners and our suppliers. Ignorance of the Regulatory Framework is not justified in any way, especially if it directly affects our work. Failure to update our Manager and the Compliance Officer for any deviations in compliance issues, is a major breach of our duties and responsibilities.

### monitoring implementation

The Compliance Officer is responsible for monitoring the implementation of the Code. The Rules of Procedure and other relevant documents, support the implementation of the Code and describe the monitoring and control mechanisms, which are:

- Inspections throughout Company's activities, including suppliers and associates to the best extent possible.
- Encouragement for reporting deviations and questions.
- Investigation of these reports at the highest management level.
- Measuring and monitoring indicators or actions about compliance.
- Official reports for Code related issues, to the highest management level.

### communicating, assisting, and consulting

KEKROPS is responsible for the training of the employees through trainings, educational and informative activities or programs and the use of IT tools. The Code is communicated to employees upon recruitment and to critical partners and suppliers at the beginning of their cooperation with us. Employees, critical partners and suppliers are informed that the Code is available at KEKROPS's official website. Employees and partners declare their acceptance of the Code upon signing of their contract (employment contract or collaboration contract with professionals of any specialty), in which a relevant paragraph is going to be included.

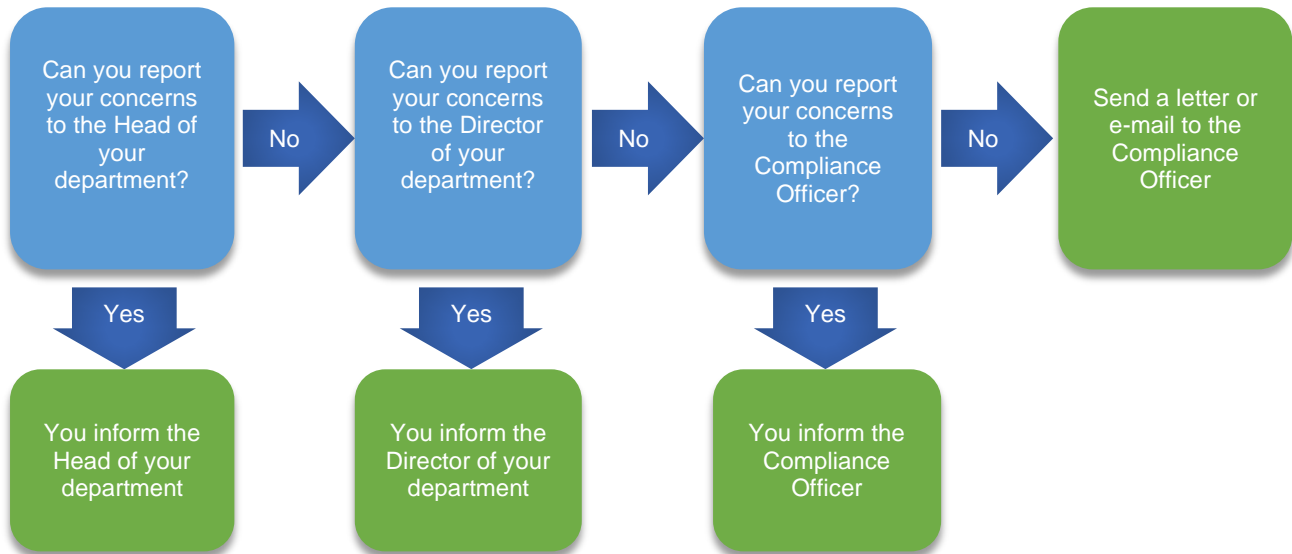
If you have questions or need clarifications on the implementation of the Code in your business field, do not hesitate to contact your supervisor. If you cannot contact your supervisor or you are not satisfied with the answers, you can contact the Compliance Officer, who will guide you through all your questions and concerns.

### reports and complaints

We are obliged to inform KEKROPS for any suspicions or concerns about incidents of fraud, corruption, bribery, harassment at work and generally deviations in the Code of Conduct of the Company which might draw our attention, via:

- Sending an anonymous or named, printed letter to the Regulatory Compliance Officer or the Regulatory Compliance Unit at the following address:  
“KEKROPS S.A., 6 Dafnis Street, Palaio Psychiko, 154 52”, with the indication “Confidential”
- E-mail to the electronic address [compliance@kekrops.gr](mailto:compliance@kekrops.gr)

The mechanism through which we can make our reports, is depicted in the following Scheme:



KEKROPS, through authorized persons at management level who are either appointed by the Board of Directors or authorized with implementing powers, investigates and evaluates each complaint it receives and determines, when necessary, corrective actions within the framework of applicable laws and Policies. It is our responsibility to work with the Compliance Officer at the stage of the investigation.

The top management of KEKROPS takes all necessary measures to ensure the anonymity and confidentiality of each employee who carries out such reports, as well as his protection against retaliation.

### no tolerance for retaliation

KEKROPS will show no tolerance for retaliation against employees who have made reports on issues concerning the Code. Retaliation is described as threats, intimidations, exclusions, degrading behaviors, malicious comments and behaviors etc.

In case such behaviors draw our attention, we immediately report them according to the mechanism mentioned above.

### consequences - penalties

KEKROPS evaluates all deviations concerning the implementation of the Code and takes all necessary actions provided by the current institutional framework and the Code of Labor, such as discontinuation of the cooperation, imposition of fine or penalty, activation of civil and criminal sanctions.

Failure to inform our Manager and the Compliance Officer for deviations of third parties in compliance issues, is a major breach of our duties and responsibilities and is subject to the corresponding sanctions.

### continuous improvement

The continuous integration of new requirements, proposals and perceptions to the Code is critical in order to reflect the changes and challenges of each era. In case you have proposals for improvement to suggest or you want to make comments on the content of the Code, you may contact the Compliance Officer.

### the Compliance Officer

The Compliance Officer is responsible for monitoring the proper implementation of the Code of Conduct in KEKROPS. His responsibilities are described thoroughly in the Code of Conduct.

The Compliance Officer is appointed by the Board of Directors of KEKROPS and refers to Top Management or as stated in the Rules of Procedure.

## our values as part of our strategy

### vision

We want to be always proud of our work. We want to achieve the approval of citizens for our works and to be useful for the society through our projects.

We want to offer value to our customers and suppliers through technologically advanced construction projects and to meet the requirements of the most demanding international standards in quality, safety and sustainable development.

To realize our vision we are committed to:

- Constantly striving for the best results in the quality of our projects, contributing to sustainable development.
- Broadening the scope of our activities.
- Constantly progressing our employees.
- Providing our employees with a safe working environment.
- Creating mutually beneficial relationships with our partners and suppliers.
- Operating in terms of sustainability and respecting the environment.
- Providing social work and supporting the communities where we operate in the context of Corporate Social Responsibility.

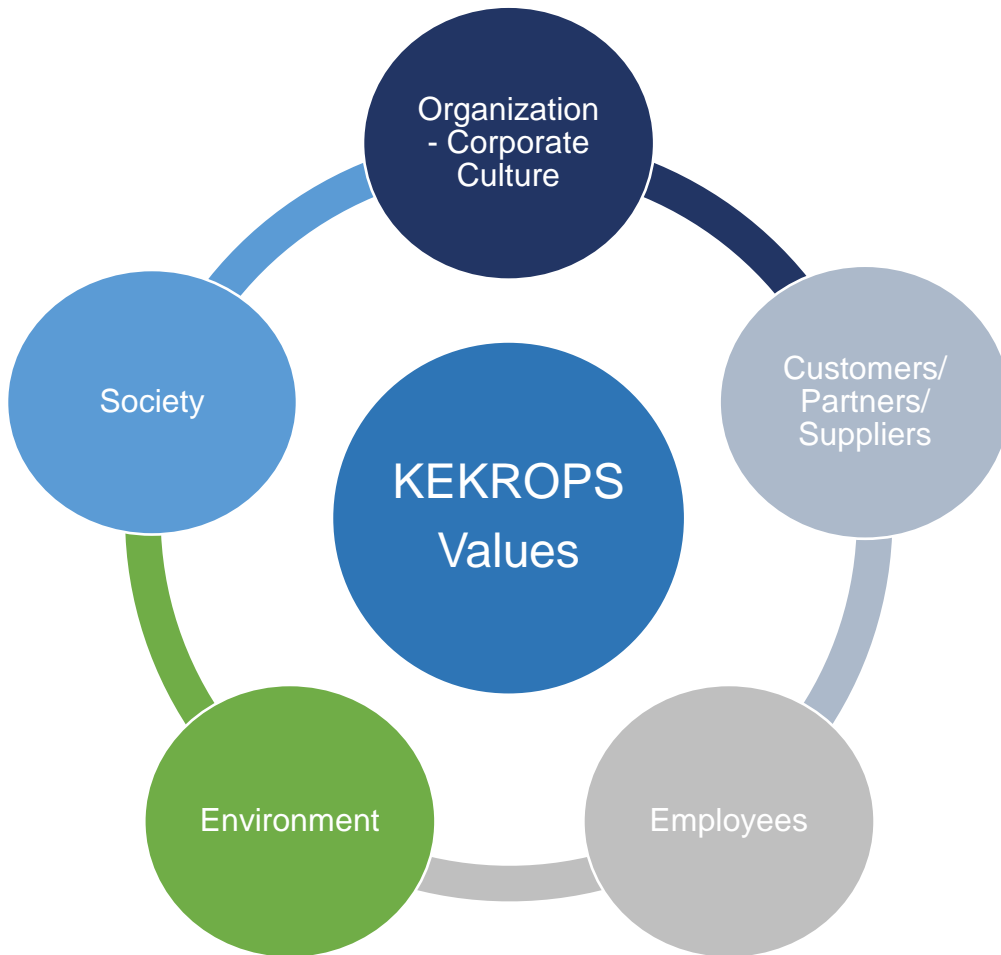
### values

Our values are reflected in five (5) main axes:

- Organization – Corporate Culture
- Customers/ Partners/ Suppliers
- Employees
- Society
- Environment



The five (5) axes are presented in the Scheme below.



The following chapters describe our main beliefs upon the main topics of the above principles.

## our projects

### our beliefs

Our projects and our activities reflect our values and demonstrate our commitment to business ethics. Therefore, our projects and our activities not only fulfill the needs and the requirements of our customers, but are also a benchmark for quality, safety and reliability.

### Main topics

focus on customers' and users' needs

focus on safety, quality and reliability

using the best international technical practices

compatibility with international standards and regulations

## our people

### our beliefs

The people of KEKROPS are the key factor of its success. We have created and constantly improve a working environment characterized by respect, transparency, equal opportunities, justice and security.

### Main topics

human rights: diversity, integrity and dignity

working relationships and practices

respect of hierarchy and organization chart

equal opportunities

harassment at workplace

employees' health and safety

conflict of interests

relations with political parties

personal data

## our customers

### our beliefs

We create long-term relationship with our customers based on trust, since customers are the main purpose of KEKROPS's existence. For this reason, our projects are characterized by quality, safety and reliability and our relationships with customers are characterized by transparency, honesty and ethical values.

### Main topics

healthy competition

honesty

gifts, meetings, sponsorships and donations

prevention of corruption and bribery

prevention of money laundering

communication and public relations

corporate image

## our partners

### our beliefs

Our partners are an important parameter for the sustainable development of KEKROPS and its operation with business ethics. Our partners affect in many cases the outcome of our work as well as our corporate image and reputation. KEKROPS wants all relationships with its partners to be transparent and mutually beneficial in order to ensure healthy and long-term cooperation.

### Main topics

shareholders and investors

partners

partners and suppliers

selection and continuous evaluation based on strict criteria

## local authorities and the society

### our beliefs

KEKROPS treats local communities with respect since they are considered to be an important factor in the success of its projects. It is KEKROPS's policy to develop and maintain mutually beneficial relationships with them.

### Main topics

participation of local community

communication with local community and contribution to local development and economy

## sustainable development and the environment

### our beliefs

KEKROPS always takes seriously the main axes of sustainable development:

- Environmental protection
- Promotion of the Human Value
- Strengthening the Social Footprint
- Configuration of Responsible Market

### Main topics

environmental protection

energy and water consumption

our obligations to future generations

## protection of our property

### our beliefs

The assets of KEKROPS are an important factor for the creation of a working environment that has all the necessary resources for the efficient operation of the Company. The assets of KEKROPS include material items such as buildings, mechanical equipment, vehicles, computers, telephones, and intangible items such as internet services, copyrights, etc...

### Main topics

respect and proper use of assets

proper and institutionalized use of network, intranet and information systems

integrity of economic data and reports

confidentiality – data protection

electronic communications (ICT Operation)

business cards of any kind (access, economic transactions)