



Occupational Safety, Health and Sustainability Services

CODE OF CONDUCT

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Purpose

This Code of Conduct (hereinafter referred to as the “Code”) defines the fundamental principles, values, and standards of behavior governing the operations and activities of ERGOPROLIPSIS L.T.D. (hereinafter referred to as the “Company” or ErgoProlipsis).

The purpose of this Code is to:

- ensure compliance with applicable laws and regulatory requirements,
- promote ethical conduct, transparency, and integrity in all company’s business activities,
- guide employees and other stakeholders in making responsible and ethically sound decisions,
- strengthen trust with customers, business partners, employees, and all stakeholders.

The Code reflects the Company’s principles and vision, serves as the fundamental framework guiding all policies, procedures, and practices it follows, and supports its commitment to responsible and sustainable business operations. Furthermore, the Code is based on internationally recognized standards of responsible business conduct and best practices.

Scope

This Code of Conduct applies to all individuals and entities associated with the Company, regardless of position, role, or form of engagement.

In particular, the Code applies to:

- Upper Management and Executives,
- all employees, regardless of their employment contract,
- external partners, self-employed, consultants, and contractors,
- any third party acting on behalf of or for the benefit of the Company.

ErgoProlipsis, expects its business partners, suppliers, and other collaborators to respect principles equivalent to those set out in this Code and to comply with applicable laws and internationally recognized standards of responsible business conduct. In addition, the Company ensures that all new employees are informed and trained on this Code of Conduct as part of the induction programme. The Company also provides appropriate training and refresher briefings to all employees on a periodic basis, with the aim of strengthening their understanding of, and compliance with, the principles and requirements of the Code.

The application of the Code takes into account the specific legal and cultural context of each country in which the Company operates. Where differences arise between local legislation and the principles of this Code, the higher standard shall apply, to the extent permitted by applicable law.

Compliance with Laws and International Standards

ErgoProlipsis fully complies with all applicable laws, regulations, and binding obligations governing its operations in every country in which it operates.

All employees, members of Management, and individuals acting on behalf of the Company are required to be familiar with and adhere to the legal and regulatory requirements relevant to their roles and responsibilities.

In addition to legal compliance, the Company is committed to conducting its activities in line with internationally recognized standards of responsible business conduct, including:

- the Guidelines for Multinational Enterprises of the OECD,
- the principles of the UN Global Compact,
- the United Nations Guiding Principles on Business and Human Rights (UNGPs),
- the Core Conventions and Declarations of the International Labour Organization.

In developing this Code, the Company took into consideration the views and expectations of its key stakeholders, including employees, management, business partners, and other affected parties. These inputs were incorporated to ensure that the Code appropriately reflects the relevant impacts, risks, and concerns associated with the Company's activities.

This Code of Conduct is publicly available and published on the Company's official website, supporting transparency and accountability.

Ethical Business Conduct and Integrity

ErgoProlipsis conducts all its business activities with integrity, transparency, and professionalism.

All decisions and actions must be based on legitimate business practices and serve the lawful interests of the Company, without undermining the trust of customers, business partners, employees or any other group of stakeholders.

The Company does not accept practices that may mislead, conceal material information, or distort the true nature of business transactions. Providing accurate, complete, and reliable information is a fundamental principle in all communications, business relationships, and transactions.

Employees and individuals acting on behalf of the Company are expected to:

- act in good faith and with responsibility,
- avoid conduct that could harm the reputation or credibility of the Company,
- exercise objectivity and integrity in decision-making.

The Company promotes ethical behavior and accountability and does not tolerate conduct that conflicts with the principles of this Code, even if such conduct could result in short-term business advantages.

Anti-Corruption and Anti-Bribery Policy

Ergoprolipsis applies a zero-tolerance policy toward all forms of corruption, bribery, improper advantage, fraud, or any other unlawful or unethical practice.

This Policy is aligned with the United Nations Convention against Corruption (UNCAC), as well as with national and European legislation, including provisions on the bribery of public officials, corporate liability of legal entities, the protection of the financial interests of the European Union, and requirements for the prevention, detection, and management of acts of corruption in the context of business activities.

The offering or acceptance of gifts, hospitality, or other business courtesies is permitted only where such practices are reasonable, transparent, and compliant with applicable law and the Company's internal policies.

The following are strictly prohibited:

- directly or indirectly offering, promising, or giving any improper advantage,
- accepting or requesting any benefit with the purpose of exercising influence over decision-making,
- facilitation payments, regardless of amount or local custom,
- donations or contributions to political parties or related persons, unless expressly permitted by law and approved in accordance with internal procedures.

Employees and non-employees, business partners, suppliers, and all stakeholders are encouraged to report, in good faith and without fear of retaliation or adverse consequences, any actual or suspected corruption through the established reporting channels.

Violations of this Policy may result in disciplinary, administrative, and/or criminal consequences, including termination of contractual relationships.

Conflicts of Interest

ErgoProlipsis is committed to ensuring that business decisions are made objectively, independently, and in the best interest of the Company.

A conflict of interest arises where personal, financial, or other interests may interfere, or appear to interfere, with an individual's ability to act in the Company's best interests.

Employees, Management, and any individual acting on behalf of the Company must avoid situations that may create actual, potential, or perceived conflicts of interest.

Conflicts of interest may include, but are not limited to:

- Personal or family relationships with clients, suppliers, or competitors

- Financial interests in entities that do business with the Company
- Outside employment or business activities that interfere with professional duties
- Acceptance of gifts, hospitality, or benefits that could influence professional judgment

Any actual or potential conflict of interest must be promptly disclosed to the appropriate supervisor or designated function within the Company.

The Company will assess disclosed situations and determine appropriate measures to manage or eliminate the conflict.

Failure to disclose a conflict of interest may result in disciplinary or contractual consequences.

Human Rights Policy

As a provider of health and safety and sustainability services, ErgoProlipsis actively contributes to the protection of fundamental human rights, particularly the right to life, health, and safe working conditions. Through its professional activities, the Company supports organizations in preventing workplace accidents, occupational illnesses, and unsafe practices, thereby reinforcing respect for human dignity and physical integrity.

ErgoProlipsis, respects internationally recognized human rights and is committed to conducting its business in a manner consistent with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Core Conventions.

The Company acknowledges its responsibility to respect human rights and to avoid causing or contributing to adverse human rights impacts through its activities or business relationships.

This Policy applies to all employees, management, and individuals acting on behalf of the Company. The Company expects its business partners and suppliers to uphold equivalent human rights standards.

The Company is committed to:

- Prohibiting forced labor, child labor, human trafficking, and all forms of modern slavery
- Protecting the right to life, health, safety, and physical integrity
- Ensuring non-discrimination, equal opportunity, and equal pay for equal work
- Respecting freedom of association and the right to collective bargaining
- Providing and promoting safe, healthy, and fair working conditions
- Protecting human dignity and preventing harassment, abuse, or any form of violence
- Respecting the right to privacy and the protection of personal data
- Supporting and safeguarding the rights of vulnerable groups, including women, young workers, and persons with disabilities

The Company promotes equal opportunity, diversity, and inclusion in recruitment, employment, training, and career development. It prohibits discrimination, exclusion, or unequal treatment based on gender, gender identity or expression, age, race, ethnicity,

nationality, religion or belief, disability, sexual orientation, marital status, political opinion, or any other characteristic protected under applicable law.

Ergoprolipsis, implements risk-based human rights due diligence processes to:

- identify and assess actual and potential human rights impacts,
- prevent or mitigate adverse impacts,
- integrate findings into internal decision-making and risk management processes,
- monitor and track the effectiveness of actions taken,
- communicate relevant information where appropriate.

Human rights risks are assessed in relation to the Company's own operations and, where relevant, its value chain.

The Company provides accessible reporting channels for employees and stakeholders to raise concerns related to human rights. Reports may be submitted in good faith and without fear of retaliation. Where the Company identifies that it has caused or contributed to adverse impacts, it commits to cooperating in or providing appropriate remediation.

Where the Company identifies that it has caused or contributed to adverse human rights impacts, it commits to taking appropriate corrective action and cooperating in or providing effective remediation, in line with internationally recognized standards.

The highest level of responsibility for the oversight of this Policy and related human rights matters rests with the General Manager, who ensures appropriate review, response, and accountability.

Labor Practices and Fair Working Conditions

The Company applies fair, transparent, and lawful employment practices across its operations.

Employment terms are established in writing and comply with applicable labor legislation. The Company ensures timely and lawful payment of wages and benefits, as well as compliance with statutory working time and leave requirements.

The Company invests in employee training, development, and professional growth in order to continuously strengthen skills and capabilities.

Matters relating to:

- human rights,
- diversity and non-discrimination,
- health and safety,
- personal data protection,
- violence and harassment at work

are further governed by the respective Company Policies.

Employee Training and Development Policy

This Policy defines the framework for the training and development of ErgoProlipsis employees, with the aim of ensuring a high level of professional competence, protecting health and safety, complying with regulatory requirements, and continuously enhancing the quality of the services provided.

As an organization operating in the fields of Health, Safety, Well-being, and Sustainability, we recognize that knowledge, continuous training, and the responsible application of training are critical prerequisites for the protection of human life, the safeguarding of safe working conditions, and the responsible operation of the Company.

This Policy applies to all employees, partners, and external collaborators of the Company, regardless of position, form of employment or engagement, or geographical location.

The Company is committed to:

- Providing the necessary training so that employees have the knowledge, skills, and competencies required for the safe, responsible, and effective performance of their duties.
- Ensuring compliance with applicable legislation, professional standards, regulatory requirements, and internal management systems.
- Continuously strengthening a culture of prevention, health and safety, professional responsibility, and continuous improvement.
- Supporting the ongoing professional development and specialization of its people, taking into account developments in the fields of health and safety, sustainability, technology, and regulatory compliance.
- Providing equal access to training opportunities without discrimination.

Mandatory Training

The Company defines mandatory training programmes on an annual basis, which may indicatively cover:

Occupational Health and Safety

- Risk management and incident prevention
- First aid and emergency response
- Company policies and procedures
- Ethics and professional conduct
- Personal data protection and cybersecurity
- Human rights, violence, and harassment
- Sustainability and responsible business practices
- Technical or professional role-specific specialization

Attendance and successful completion of mandatory training programmes constitute an obligation for all employees.

The Company's training programmes are divided into different categories, depending on their purpose, subject matter, and the needs of the organization and its employees. In particular, they include:

- cross-functional mandatory training programmes that apply to all personnel and cover key matters of compliance, health and safety, policies, and corporate requirements,
- mandatory training programmes by role or specialty, which are designed on the basis of professional responsibilities, technical requirements, and the risks associated with each job position,
- optional training programmes for professional development, specialization, or personal empowerment,
- as well as training programmes proposed or requested by employees themselves, in the context of continuous skills development and knowledge enhancement.

Training programmes may be carried out on an annual or periodic basis, during the onboarding of new employees, in the event of revisions to policies, procedures, or legal requirements, following incidents or the identification of new risks, as well as whenever new operational, technological, or regulatory needs arise.

Employee Obligations

Employees are required to:

Actively participate in and complete, within the defined timeframes, all mandatory training programmes designated by the Company.

- Apply in practice the knowledge, instructions, procedures, and safe practices acquired through training.
- Contribute to maintaining a safe and healthy working environment for themselves, their colleagues, clients, and any third party affected by the Company's activities.
- Inform Management or the competent responsible persons of any additional training needs or issues that may affect the safe performance of their work.
- Comply with the Company's policies, procedures, and work instructions.

Failure to complete mandatory training programmes or systematic non-compliance with required practices may be assessed within the framework of the Company's internal performance management and compliance procedures.

Evaluation and Continuous Improvement

The Company periodically evaluates:

- the effectiveness of training programmes,
- the level of participation and understanding,
- skills development needs,
- as well as the application of training in everyday work.

The results are used for the continuous improvement of the training framework, the strengthening of operational readiness, and the maintenance of high standards of quality, health, and safety.

This Policy is periodically reviewed to ensure that it remains aligned with developments in legislation, operational needs, technological advancements, and best practices in the Company's fields of activity.

Policy for Workers Welfare

ErgoProlipsis implements a Workers Welfare Policy, which is communicated to all employees and operates in conjunction with ErgoProlipsis' Human Rights Policy and Code of Conduct. It constitutes the practical implementation of the Company's commitment to protect the rights, health, safety, and dignity of individuals working in its operations and value chain.

This section provides a summary of the Company's Workers Welfare Policy, which exists as a standalone document.

Occupational Health and Safety

ErgoProlipsis places people at the center of its operations and recognizes that the protection of life, health, and physical and mental integrity constitutes a fundamental right.

The Company implements a certified Occupational Health and Safety Management System in accordance with the international standard ISO 45001 and integrates health and safety principles into its overall management and decision-making processes.

The Company is committed to full compliance with applicable legislation and regulatory requirements and seeks the continuous improvement of its performance in health and safety matters.

Our approach is based on:

the systematic identification, assessment, and control of risks, with the aim of preventing and, where feasible, eliminating them,

- the prevention of workplace accidents and occupational diseases,
- the protection of the health and safety of all employees, contractors, visitors, and third parties entering areas under the Company's responsibility,
- the continuous improvement of working conditions and control procedures,
- the setting of objectives and the systematic monitoring and evaluation of performance,
- the training and information of all employees regarding their obligations and responsibilities in health and safety matters,
- the promotion of physical and mental health.

The Company's ultimate objective is to prevent any health and safety incident that could affect employees or other persons involved in its activities.

The Company expects its partners, contractors, suppliers, and any person acting on its behalf to comply with applicable health and safety legislation, the requirements of the Company's Management System, and their contractual obligations.

Compliance with health and safety requirements is mandatory for all. Violations may result in disciplinary and/or contractual consequences, in accordance with the Code of Conduct and the internal procedures of ErgoProlipsis.

ErgoProlipsis provides accessible reporting channels for health and safety matters, through which employees and stakeholders may report, in good faith and without fear of retaliation, risks or incidents. Where non-compliance or adverse impacts are identified, corrective measures are taken immediately and appropriate remediation actions are implemented.

This Policy operates in conjunction with the Company's Human Rights Policy, as health and safety constitute the practical implementation of the right to life and human dignity.

This section provides a summary of the Company's Occupational Health and Safety Policy, which exists as a standalone document.

Anti-Violence and Harassment at Work Policy

The Company, within the framework of its Anti-Violence and Harassment at Work Policy and in accordance with Law 4808/2021 ([Anti-Violence and Harassment at Work Policy](#)), conducts a systematic assessment of relevant risks and implements appropriate measures for their prevention, control and effective management. It has established clear reporting and investigation procedures, appoints a designated contact person ("liaison") to guide and inform employees, carries out awareness-raising and training initiatives, and safeguards the rights and obligations of all involved parties. Particular attention is also given to the protection of employment and the support of employees who are victims of domestic violence, including the provision of reasonable accommodations where appropriate.

This section provides a summary of the Company's Anti-Violence and Harassment Policy, which exists as a standalone document.

Diversity, Equity, and Inclusion

The Company fosters a working environment based on respect, meritocracy, and equal treatment. It is committed to ensuring equal opportunities across all stages of employment, including recruitment, evaluation, training, career development, and remuneration.

Any form of discrimination, exclusion, or unequal treatment based on gender, gender identity or expression, age, race, ethnicity, nationality, religion or belief, disability, sexual orientation, marital status, political opinion, or any other characteristic protected under applicable law is strictly prohibited.

The Company actively promotes diversity and inclusion, recognizing that a diversity of experiences and perspectives enhances innovation, collaboration, and organizational performance.

The Company expects its business partners, suppliers, and any individual acting on its behalf to adopt and implement principles of equal treatment, diversity, and inclusion, in accordance with applicable law and the Company's Code of Conduct.

Issues relating to human rights and employment practices are further governed by the relevant Company Policies.

Social Policy

ErgoProlipsis recognizes that its business activities have an impact on society, local communities, and the stakeholders with whom it interacts. The Company is committed to operating with responsibility, transparency, and respect toward the communities in which it operates, as well as society as a whole.

The Company:

- respects the rights and dignity of local communities,
- takes into account the social impacts of its activities,
- seeks to avoid or mitigate potential adverse effects,
- expects its partners, suppliers, and any individual acting on its behalf to uphold equivalent principles of social responsibility.

Compliance with applicable legislation and fundamental human rights principles constitutes a minimum requirement in all business relationships.

Through its activities in the fields of health, safety, and prevention, ErgoProlipsis contributes meaningfully to:

- the reduction of workplace accidents and occupational diseases,
- the enhancement of employee well-being,
- the strengthening of organizational resilience,
- the promotion of sustainable development of businesses and communities.

Prevention, the protection of life, and the promotion of health constitute key mechanisms for creating social value and generating positive impact.

In supporting local communities, ErgoProlipsis selects social contribution initiatives following an assessment of social needs and potential impacts, aiming at:

- maximizing positive social benefit,
- ensuring the sustainability of interventions,
- maintaining transparency in the allocation of resources.

Social responsibility initiatives are aligned with the Company's values and purpose.

The implementation of this Policy is overseen by the Company's Management. ErgoProlipsis monitors its social impacts and seeks the continuous improvement of its practices.

Environmental Policy

The Company is committed to protecting the environment and conducting its activities in a responsible and sustainable manner. Environmental protection is an integral part of the Company's business development and daily practices. As a provider of professional services, the Company is committed to minimising the environmental footprint of its own activities and promoting responsible environmental practices across its value chain and in its collaborations with clients.

The Company complies with applicable environmental legislation and regulatory requirements and incorporates environmental criteria into its operational and strategic decision-making processes.

To effectively manage its environmental responsibilities, the Company implements a certified Environmental Management System aligned with the principles of ISO 14001:2015, proportionate to the size and nature of its activities. In this context, the Company:

- identifies and evaluates the environmental aspects of its activities,
- sets realistic environmental objectives,
- monitors performance and applies improvement actions where required,
- promotes continuous improvement.

The Company is committed to:

- improving energy efficiency and using natural resources responsibly,
- minimizing waste generation and promoting reuse and recycling,
- preventing pollution and reducing greenhouse gas emissions associated with its activities,
- encouraging responsible choices in transportation and procurement.

In its professional role, the Company supports its clients in improving their environmental performance, including actions related to climate change mitigation and adaptation, as well as broader sustainability practices.

Suppliers and business partners are expected to comply with applicable environmental legislation and adopt responsible environmental practices.

The Company promotes environmental awareness among its employees through information, training and guidance, encouraging responsible behaviour in their daily activities.

This Policy is approved by Management, applies to all employees and is periodically reviewed to ensure its ongoing suitability and effectiveness. As a minimum requirement, the Company expects suppliers, business partners and other stakeholders to comply with applicable environmental legislation and regulatory requirements, as well as to conduct their activities lawfully and responsibly.

Quality of Services and Professional Excellence

ERGOPROLIPSIS is committed to delivering high-quality services with professionalism, technical competence, and a focus on continuous improvement.

The Company implements a Quality Management System in accordance with ISO 9001 and maintains a Quality Policy defining its principles, objectives, and commitments to reliable and effective service delivery.

Service provision is based on:

- compliance with applicable laws and regulatory requirements,
- understanding and meeting client needs,
- ensuring technical competence and continuous training,
- risk management and continuous process improvement.

The Company ensures that its services are delivered with objectivity, integrity, and independent judgment.

Implementation of quality principles is monitored within the framework of the Company's Management System and internal control procedures.

This section provides a summary of the Company's Quality Policy, which exists as a standalone document

Information Security Policy

ERGOPROLIPSIS recognizes that information, customer, employee and partner data, as well as its information systems, constitute critical assets for its secure and reliable operation. For this reason, the Company implements an Information Security Policy based on the principles of confidentiality, integrity, availability of information, and the principle of least privilege access. The Policy is aligned with the requirements of the ISO 27001 standard and the applicable regulatory framework for the protection of personal data, including the General Data Protection Regulation (GDPR).

Responsibility for overseeing the information security framework lies with the Company's upper Management, which ensures the allocation of the necessary resources, the implementation of relevant procedures, and the continuous improvement of the management system. The Policy is communicated, made available and signed by all employees, while its key requirements are also communicated to external partners, suppliers and contractors who gain access to the Company's information or systems. All employees and partners are required to protect the information they handle, use the Company's systems exclusively for approved professional purposes, comply with confidentiality requirements, and promptly report any incident or suspicion of an information security breach.

The Company applies specific rules regarding the use of digital tools and artificial intelligence technologies, prohibiting the input of confidential or personal data into non-approved

applications and ensuring that any output generated through AI technologies is subject to human review and verification before use.

This section provides a summary of the Company's Information Security Policy, which exists as a standalone document.

Data Protection and Confidentiality

ErgoProlipsis recognizes the importance of protecting personal data and respecting the right to privacy. It processes personal data in full compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR), applicable national legislation, and other relevant regulatory requirements.

Personal data are processed lawfully, fairly, and transparently, and only for specified, explicit, and legitimate purposes. The Company ensures that personal data are:

- adequate, relevant, and limited to what is necessary,
- accurate and kept up to date,
- retained only for as long as required,
- protected against unauthorized access, loss, misuse, or disclosure.

The Company implements appropriate technical and organizational measures to safeguard personal data, including access controls, confidentiality obligations, data security procedures, and staff awareness.

Personal data are processed strictly on a need-to-know basis and only by authorized personnel.

Individuals whose data are processed by the Company have the right to:

- access their personal data,
- request rectification or erasure,
- request restriction or object to processing where applicable,
- request data portability,
- lodge a complaint with the competent supervisory authority.

The Company maintains procedures for the identification, assessment, and timely notification of personal data breaches, in accordance with GDPR requirements.

ErgoProlipsis expects its partners, suppliers, and any third parties processing personal data on its behalf to comply with applicable data protection laws and to implement equivalent safeguards through contractual arrangements.

Oversight of data protection compliance is assigned to the competent function within the Company, under the supervision of Management.

Further details are provided in the Company's Privacy Policy and relevant internal procedures.

ErgoProlipsis ensures the confidentiality of information received in the context of its cooperation with clients, partners, and other stakeholders. All confidential, business,

technical, or other non-public information is used solely for the purpose of delivering the agreed services and shall not be disclosed to third parties without a lawful basis or prior authorization (written).

Fair Competition and Responsible Market Conduct

ErgoProlipsis conducts its business in a fair, transparent, and responsible manner and fully complies with applicable competition and antitrust laws.

The Company does not engage in any form of anti-competitive behavior, including:

- price-fixing or coordination of commercial terms,
- market or customer allocation,
- bid-rigging or collusive tendering,
- exchange of commercially sensitive information with competitors,
- abuse of a dominant market position, where applicable.

Business decisions are made independently and based on objective commercial criteria.

The Company competes on the basis of quality, expertise, innovation, and integrity. Marketing and communications must be accurate, truthful, and not misleading.

Employees must avoid any conduct that could restrict, distort, or undermine fair competition. Participation in industry associations, professional bodies, or meetings with competitors must comply strictly with competition law requirements.

ErgoProlipsis expects its business partners and any individual acting on its behalf to adhere to the same principles of fair competition and responsible market conduct.

Procurement Policy

This Policy defines the principles and framework under which ErgoProlipsis selects, evaluates, and monitors suppliers, contractors, and business partners, ensuring legality, transparency, and responsible business conduct throughout its supply chain.

ErgoProlipsis is committed to conducting its procurement activities with:

- Transparency
- Objective and documented criteria
- Avoidance of conflicts of interest
- Compliance with applicable laws and regulatory requirements
- Promotion of sustainable and responsible practices

The Company expects its suppliers, contractors, and business partners to fully comply with applicable labor, environmental, and other relevant national and European legislation. It requires the prohibition of all forms of forced or child labor, adherence to health and safety standards, implementation of anti-corruption practices, and the protection of personal data and confidential information.

ErgoProlipsis may request documentation, certifications, declarations of compliance, or other supporting evidence from suppliers in order to verify adherence to the above requirements.

Supplier performance and compliance are monitored on a regular basis, based on criteria including the quality of services or products provided, compliance with contractual terms, adherence to regulatory requirements, and performance in environmental, social, and governance (ESG) matters.

Supplier evaluation is based on:

- Quality and technical competence
- Financial criteria
- Legal compliance
- Environmental performance
- Compliance with health and safety requirements
- Respect for human rights
- Ethical conduct and anti-corruption practices

The Company does not tolerate any form of money laundering or terrorist financing. We work only with clients, suppliers, consultants and third parties who have a good reputation, operate lawfully and whose funds come from legitimate sources.

We do not enter into or continue business relationships with individuals or companies that have been involved in a criminal organisation, corruption, fraud, terrorism, money laundering, child labour or any form of human trafficking, or that have committed serious breaches of environmental or occupational health and safety legislation.

Before entering a business relationship we carry out the appropriate checks, and whenever something seems unusual or suspicious, we report it promptly to the General Manager. We expect the same from our partners across our supply chain.

Compliance with the Company's Code of Conduct and related Policies constitutes a prerequisite for cooperation.

In cases of non-compliance, the Company may require the implementation of corrective actions within a defined timeframe or, where necessary, proceed with the limitation or termination of the business relationship.

Implementation of this Policy is overseen by the Company's Chief Financial Officer and the General Manager and forms part of ErgoProlipsis' corporate governance framework, ensuring continuous monitoring and improvement of procurement practices.

Reporting Concerns and Whistleblowing

ErgoProlipsis encourages employees, partners, and other stakeholders to report in good faith any violation of applicable laws, the Code of Conduct, or Company Policies.

Reports may relate, indicatively, to corruption, conflicts of interest, human rights violations, health and safety issues, data protection breaches, or any other non-compliant conduct.

The Company provides established and accessible reporting channels that ensure confidentiality and the protection of personal data.

Reports may be submitted in good faith without fear of retaliation. Any form of retaliatory or adverse treatment against an individual who raises a concern is strictly prohibited.

The Company ensures the objective and impartial assessment of all reports and, where necessary, takes appropriate corrective or disciplinary measures.

Reports submitted maliciously or in bad faith may result in consequences in accordance with internal procedures.

The reporting and case-handling process forms part of the Company's compliance and corporate governance framework.

Implementation, Monitoring, and Accountability

Implementation of this Code of Conduct is the responsibility of all employees, executives, Management, and any individual acting on behalf of ERGOPROLIPSIS.

Management ensures that the principles of the Code are integrated into the Company's operational processes, policies, and management systems.

Compliance with the Code is monitored within the framework of the Company's corporate governance and compliance system through:

- internal audits or assessments,
- risk management processes,
- reporting mechanisms for violations,
- regular review of policies and procedures.

Where deviations or violations are identified, appropriate corrective measures are taken. The Company is committed to the continuous improvement of its practices and to strengthening a culture of integrity and responsibility.

Management is accountable for the effective implementation of the Code and ensures that relevant responsibilities are clearly assigned within the organizational structure.

Final Provisions

This Code of Conduct is approved by the Management of ERGOPROLIPSIS and applies across all levels of the Company.

All employees, executives, members of Management, and any individual acting on behalf of the Company are required to be aware of, understand, and comply with the principles and provisions of this Code.

The Company ensures the communication and availability of the Code to all relevant stakeholders and provides for its periodic review to reflect legislative developments, international standards, and operational needs.

The Code is published on the Company's website and enters into force as of the date of its approval.

Non-compliance with the provisions of this Code may result in disciplinary, administrative, and/or contractual consequences, in accordance with applicable procedures.

Revision History

Version	Date	Description of Changes	Approved by
01	03/12/2025	Initial Version	Giannis Aspirtakis
02	23/06/2026	Update with Employee training policy	Giannis Aspirtakis