

CODE OF PROFESSIONAL ETHICS

Introduction

The purpose of the present Code of Professional Ethics (hereinafter the "Code") is to reflect in a single text the general principles and rules that should govern (a) the relationship between the Management of the Company and its employees (b) the attitude of the Management of the Company towards third parties (outsourcers, suppliers and customers) (c) the professional conduct of all employees of the ADAPTIT Group companies (hereinafter the "Group").

The Code, defines the day-to-day operations and behavior of the employees of the Group, but also constitutes a manual of rules regarding the acceptable conduct between employees as well as between employees and third parties, whether individuals or legal entities, governed by private or public law, national or foreign, and applies to all employees of the Group regardless their hierarchical classification.

The principle of the Code relies on the business activity of the Group, the current legislative framework that governs its' operation, the high-level services and products it provides in the frame of its business activity and the standards of professional behavior it has adopted in order to exercise that business activity.

The ultimate objective is to align the long-term interests of the companies with the interests of the owners (Shareholders) and other key stakeholders.

The Code is based on international and local best practices and is compatible with the legislation and the regulations, as applicable, with respect to the Greek entities of public interest.

The Code addresses, concerns and binds both the existing employees of the Group and the persons recruited, who automatically and mandatorily join the Code.

The Board of Directors of the Group's companies approved this Code of Ethics and will review it whenever deemed appropriate.

The Code is posted on the companies' website. During its review, companies take into consideration the relevant amendments of laws, regulations, best international corporate governance practices, as applicable, as well as any recommendations by competent authorities.



The Boards of Directors, with the support of the Legal Department, are responsible for the interpretation of the provisions of the Code, if necessary.

For reasons of consistency and transparency, the Code occasionally may refer to individual provisions of laws, regulations and companies' statutes. In case of disagreement, the laws, regulations and statutes prevail over the Code's provisions.

1. Business Ethics

Business ethics is not just compliance with legal, regulatory, professional and business standards but, and mainly, is the development of entrepreneurial activity within rules of justice, integrity, honesty and respect. Business ethics is a prerequisite for a modern, high performance business. The contribution of all employees in maintaining social cohesion and the investment in prosperity are key prerequisites for long-term and sustainable business activity, giving the Group a high added value.

2. Compliance with the law

Compliance with the applicable legislation, wherever the Group operates, is a basic and non-negotiable principle for all employees.

3. Confidentiality

Corporate confidential information and documents are invaluable capital for the Group, and releasing them could cause damage. Regardless the damage, however, keeping confidentiality is a proof of credibility and professionalism.

Thus, we are all obliged to ensure the confidentiality and ensure for the management, proper storage and protection of the information we have access to.

Confidential information includes all data, records, documents, know-how, studies, drawings, photographs and any other material pertinent to the organization and assets of each company, business and financial transactions, research and development activities as well as the legal and administrative procedures involving each of the companies. Confidential is considered also any information that each company or the Group wishes to be treated as confidential.

Any employee who holds confidential information about the business activities of each company must use such information only for authorized purposes.



The use of internal information for someone's own financial benefit, or disclosure of this information to another, friendly or relative person or partner, and in general to any person not authorized to obtain knowledge in order to take any investment or business decision, is not permitted.

We should, also, manage in a confidential manner the personal data of all individuals, such as the members of the Management, executives, employees, customers and suppliers with which each company transacts as well as all third parties.

The obligation to protect and properly use this information and data remains valid even when the employment relationship with either company is terminated.

4. Protection of Group's Assets

The members of the Boards of Directors, the Directors and the respective supervisors are responsible for the design, establishment and management of the appropriate policies for the preservation of the Group's assets. The assets include real estate, machinery and vehicles, computers, software and in general fixed assets, corporate information, the reputation of each company of the Group, customers, trademarks and brand names. All employees are obliged to protect the assets and resources of the Group and pay attention when using the Group assets and draw attention in order to avoid waste, damage, destruction or theft of the Group's assets.

5. Equal Opportunities/ Non- discrimination

Our Group complies with the current legislation and corporate policies regarding equal opportunities and non-discrimination.

It offers to all employees equal opportunities, both during the selection process and in their professional development, ensuring that everyone is treated equally based on their skills and abilities without any discrimination.

On the contrary, it condemns all forms of discrimination regarding color, religion, age, gender, marital status, disability, nationality or any other type of belief.



6. Conflict of Interest

Business decisions must be taken based on the interests of the Group and each company of the Group and not on personal interests or relationships.

Employees must refrain from any business activity, during which, private interests might prevent them from taking impartial decisions for each of the companies' best interest.

Thus, all employees, Directors, Sales, Administrative and Technical Staff are required to avoid any activities, during the performance of their duties, aiming at their own financial interest or other personal benefits and which undermine their integrity, violate their duty of loyalty and are inconsistent with their professional activity in each of the companies.

7. Anti-Bribery/Anti-Corruption

By pursuing only transparent and legitimate actions, all the transactions of each company are carried out in accordance with the anti-bribery legislation applicable, in an absolute manner and in accordance with the principles outlined in the Human Resources Manual.

Employees are not permitted to offer, pay, require or accept any service, money or any other benefit of value to a third party (public or private employee) aiming to obtain a favorable treatment for the Group or for one of the companies of the Group.

Exceptionally, in the framework of corporate public relations, gifts and meals of small value are permitted and do not harm the integrity or reputation of any person involved, nor can they be interpreted as actions aiming to obtain an unfair advantage.

8. Intellectual Property

The use of trademarks and other elements of intellectual property, irrespective of their legal protection, and which are a valuable asset of the company, should always be done in a proper manner.

Such elements are mainly our trademarks, logos, copyrights, inventions, patents, creations like software, firm practices of each company, the form of official documents, and any product of work of our employees.

A third party should never be allowed to use our trademarks or other proprietary notices without proper authorization.

In addition, our trademarks should never be used in a degrading, defamatory or offensive manner.

Similarly, we are responsible for the proper use and protection of intellectual property rights of third parties in cases where use is granted to either of the companies and we avoid using them beyond the scope of their concession.



9. Support of the Image of the Group and either of the companies

Respecting the fact that our personal presence reflects the image of the Group and either of the companies, we must ensure that it is aligned with our fundamental principles even when we are outside the working environment.

It is our primary concern to avoid putting the Group and either of the companies in a difficult position.

10. Corporate Social Responsibility

We believe that Corporate Social Responsibility is equally important with any other aspect of activity in a contemporary company that is sensitive to today's problems. For this reason, we have adopted practices that are in line with the applicable laws and regulations regarding sustainable development.

We recognize the obligation we have to, operate safely, protect the environment and support the local communities in which we operate. We invest and contribute actively to improving the quality of life for everyone inside and outside the business.

11. Relations with customers and suppliers

Relations with our customers and suppliers must be governed by the principles of honesty, transparency, mutual respect and impartiality, ensuring beneficial, stable and long-term partnerships.

We help our customers achieve their goals by providing them with products and services of excellent quality and in full compliance with the legislation applicable.

Our suppliers have a critical role for our business activity, and we expect them to behave in an ethical way. We also expect them to comply with the applicable law and adhere to and respect similar principles to those contained in the present Code of Ethics. We choose our suppliers fairly and on merit, based on criteria such as the quality of the products and services provided, pricing policy, time consistency in the delivery of products and services, as well as the experience and integrity of each supplier.

12. Fair Competition

We believe in a fair and competitive market, and that our competitive advantage must be achieved through high-quality, customer-oriented and innovative products and services. The activities of either of our companies are conducted within a framework of fair competition and strict compliance with the applicable legislation on unfair competition.



13. Application of Code

The Code of Ethics applies to board members, directors, employees, and generally to any person providing services to the companies without any exception or deviation. We are all obliged to comply with its rules and ensure its application. The Companies' Boards of Directors and Directors must ensure that its content will be part of the corporate culture and will be integrated into all internal regulations and procedures and all technical and procedural measures for its implementation will be taken.

Every employee is obliged to know the content of the Code and cannot plead ignorance of its content as an excuse. In case of any doubt the Legal Department (legal@adaptit.gr) can provide a responsible answer.

Infringements should be reported to the Managing Director. Any violation or attempt to conceal will be investigated.