



Head office Piraeus:

12, Polidefkous Str | 185 40 Piraeus | Greece
Tel. +30 210 4124880 or +30 210 4122822 | Fax +30 210 4116781
e-mail: info@papadopoulos-sa.com

Branch office Thessaloniki:

120, K. Karamanli Ave | 570 08 Ionia | Greece
Tel. +30 2310 780808 | Tel./Fax +30 2310 784884
e-mail: thes@papadopoulos-sa.com
www.papadopoulos-sa.com

COMPANY CODE OF CONDUCT

We take responsibility

J. & E. PAPADOPOULOS SA believes in the values that hold our society together and make it work. Only when everyone is convinced of these values and adheres to them, when everyone can rely on adherence to these principles, only then can our society develop and prosper - for the benefit of all. It is not only the people who benefit from this. Our environment should not be ignored either. After all, we are responsible today for the world in which our children will live tomorrow.

As a family business, we are aware of this responsibility to the next generation and we strive to live up to it as much as possible. Of course, this also includes the financial success of our company, which we never lose sight of. However, short-term profit maximisation at any price is not in line with our corporate philosophy. We want to grow continuously and sustainably as a team. To achieve this, we rely on motivated employees. We only work with suppliers who share our corporate philosophy. In this way, we convince our customers with good quality, reliable service and fair but realistic prices.

We uphold these values.

General principles

We align our business actions and decisions with generally applicable ethical values, in particular integrity, reliability and respect for human dignity. We promote transparency, responsible management and control in the company in an appropriate manner.

The Code of Conduct applies to all our company locations and business units in all countries in which we operate. Our managers have a special role model function in implementing and complying with the guiding values.

We expect our suppliers to comply with the guiding values of the Code of Conduct, support them in this to the best of our ability and encourage them to do the same in their supply chains.

We comply with the laws and other legal regulations of the countries in which we operate. This applies in particular to national and international embargo and export control regulations.

Behaviour towards competitors, business partners and third parties

We respect the rules of fair and open competition and do not enter into agreements that affect competition in an unfair manner.

We explicitly oppose all forms of corruption, whether internal or external, and avoid even the impression that we are trying to influence business decisions through unfair business practices.

None of our employees may use their position in our company to demand or accept unfair advantages for themselves or third parties.



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Any tangible or intangible benefit to employees or agents of a company in exchange for preferential treatment in business transactions is prohibited.

Invitations, such as to business lunches or events, which are consistent with accepted business practices and are appropriate, may be extended or accepted if they do not serve the purpose of improper preferential treatment. The same applies to the acceptance or giving of gifts.

All kinds of privileges to public officials and other public officials, as well as to representatives of state bodies, even indirectly through third parties, are generally prohibited.

In the case of benefits to political parties and political organisations, as well as to agents and candidates for political office, the laws in force must be respected.

The awarding of contracts to consultants, agents and other intermediaries should not serve to circumvent the prohibition of bribery.

Donations should be made only on a voluntary basis and without expectation of reward. Donations and sponsorships must not be intended to covertly promote decisions in the company's interest.

Avoiding conflicts of interest

We demand and expect loyalty from our employees. We ensure that our employees do not find themselves in situations where their personal or financial interests conflict with those of the company or its business partners.

Secondary activities and interests in competitors or business partners should not interfere with the interests of the company. This also applies to the participation of a close relative or life partner.

Treatment of information

We require our employees to maintain confidentiality regarding company and business secrets and other internal matters. This applies accordingly to information about contractual partners and customers that is not accessible to the public.

We guarantee compliance with the provisions of data protection legislation. Personal data may only be collected, processed and used to the extent permitted by the relevant laws. Documents containing personal data about employees are treated confidentially and secured from unauthorised access.

Principles of social responsibility

Social responsibility is an essential component of values-based corporate management and an essential factor for sustainable corporate success.

We respect and support internationally recognised human rights.



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We comply with the prohibition of child labour and forced labour in all its forms.

Discrimination against employees and third parties is not tolerated. We strongly oppose unacceptable treatment of workers, in particular sexual or verbal harassment.

We promote equal opportunities for our employees.

We recognise Article 12 of the Constitution on the right of workers to assemble and associate to the extent that this is legally permissible under national regulations. We comply with applicable national laws and labour standards regarding appropriate remuneration and maximum working hours. We ensure overall fair working conditions.

Occupational safety and health protection in the workplace are ensured within the framework of national regulations.

We are committed to complying with the applicable environmental protection standards for our respective areas of operation and ensure compliance with the law.

With regard to consumer interests, we comply with consumer protection regulations.

We contribute to the social and economic development of the country and the region in which we operate.

Compliance with the Code of Conduct

We familiarise our employees with the content regulated in the Code of Conduct and explain the obligations arising from it. We actively communicate the principles of the Code of Conduct to our business partners.

We take all necessary measures to implement the core values contained in the Code of Conduct through appropriate organisational measures and appropriate policies and procedures in all business areas.

We are committed to regularly monitoring compliance with these measures.

Violations of the Code of Conduct and legal provisions may, depending on their severity, give rise to consequences under labour and liability law and may also lead to criminal sanctions.

Contact person for the Code of Conduct

We have a contact person for the Code of Conduct. His or her contact details are known to our employees and are publicly available.

All employees are required to report serious violations of laws, internal rules and the Code of Conduct to either their supervisor, the contact person or any other office authorized by the company to receive reports. The complainant should not suffer any disadvantage as a result.