

Autohellas	CORPORATE GOVERNANCE	
	RECOMMENDATIONS	Date of approval by the BoD: 14.7.2021
	AUTOHELLAS GROUP CODE OF ETHICS	Date of 1st issue: 14.7.2021

**CODE OF ETHICS
AUTOHELLAS GROUP**

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1. Introduction.

The Code of Ethics of the Autohellas Group (the "**Code of Ethics**") provides the framework of principles and rules for achieving the best possible result in the exercise of the activities of the Company and its Group companies (the "**Group**" or "**Autohellas Group**"). It is based on best international practices, legal and regulatory obligations as well as the application of high standards of corporate and social responsibility.

The management and employees of the Company and the companies of the Group are committed to complying with these principles when performing their duties. The values and principles of the Code of Ethics form the basis of the policies and procedures, which the staff of the Company and the Group companies must know and apply.

2. Fundamental Principles and Values.

Reputation and a good name constitute, together with human resources, the most valuable asset of the Autohellas Group, establishing the commitment to respect the principles and values, which are summarized as follows:

- Integrity,
- Honesty,
- Sincere, fair, honest and transparent transactions,
- Quality and ability to provide services - value to the customer
- Avoiding negative comments about the Company's competitors,
- Placing the interests of the Company above individual interests,
- Meritocratic approach to matters of staff selection, partners and suppliers,
- Complying with the spirit and letter of laws and regulations that affect actions to carry out our duties,
- Continuous improvement.

The application of these principles governs the relations of the Company and the Group companies with their employees, customers, shareholders, partners and competitors and forms the following Code.

2.1. Privacy – Confidentiality – Stock Market Transactions

We must handle with privacy and confidentiality all the information of the Group and/or our customers, suppliers and partners, in order to ensure the trust of our customer base and compliance with the applicable legislation.

Confidential information is information, which is not publicly known. Their disclosure to unauthorized persons negates the confidentiality of any

relationship of the Company and the companies of the Group with customers or with staff and negatively affects the competitive position of the Group.

Each employee has an obligation to:

- Protect the confidentiality and integrity of the Group's information.
- Not to disclose confidential information concerning the operations of the Company and Group companies, the cooperation of customers or suppliers with the Group or other personal and financial matters of customers, suppliers, partners and employee members, to unauthorized persons during their service at the Company and the companies of the Group, as well as after its termination.
- Not to share or discuss confidential information with any third party (employee or non-employee) who has not been given access to such information.
- To keep confidential all documents containing confidential information, unless their destruction is required (always in accordance with the applicable policy on document destruction and the indicated procedures and guidelines).
- Not to disclose to any third party (employee or non-employee, including any supervisors thereof as well as the system administrators of the Company and the Group companies) the access codes to the electronic systems of the Company and the Group.
- To avoid any act or omission, which may potentially cause leaking of information related to customers, transactions and business agreements.
- To follow the security rules of information and systems as recorded in the relevant manuals.

Any disclosure of confidential information to third parties is only allowed following the written approval of the management or following any relevant court decision.

Employees who have access to confidential information which may affect the price of shares or other financial instruments of any listed company of the Group, must maintain such information confidential. Accordingly, they are obliged not to proceed to any transaction regarding these shares, for their own account or for the account of any third party, taking advantage of the confidential information. In general, they must fully comply with applicable insider trading laws. For this reason, all such employees must be aware of and comply with the applicable legislation, the labor regulation they have received, as well as their employment agreement.

2.2. Professional Conduct

The Group's goal is to maintain high standards of professional conduct in all transactions and relations, both with customers and colleagues. For this purpose, every employee must behave with an ethical and dignified

manner. The staff must behave with courtesy and offer high quality services to the customers of the Company and the Group companies applying the service standards and Group values. Equal treatment without prejudice is required for all customer without exception.

The Group understands any complaints from its customers and has a special complaints department, where such issues are addressed with sensitivity and efficiency.

Harassment of any kind is not tolerated. In order to avoid any form of harassment in the workplace and to create a respectful and inclusive work environment, no comments or exclusions are allowed regarding age, racial origin, political beliefs, trade union membership, religion, sexual orientation, marital status, pregnancy, nationality and any special needs etc. to customers, colleagues, visitors and associates.

2.3. Conflict of Interests

Business decisions must be taken in accordance with the interests of the Group as a whole and not based on personal interests, relationships or benefits. Employees must refrain from any business activity in the exercise of which private interests may prevent them from making an objective decision. In situations where personal interests may conflict with the interests of the Autohellas Group, the employee must communicate them to the members of management, who in turn must ensure that an appropriate solution is found. The employee's personal interests include the interests of "closely connected" persons, such as relatives by blood or by marriage, close personal friends, etc. and legal entities in general.

All necessary steps should be taken, in accordance with the Group's conflict of interest and anti-bribery and corruption policies, to avoid conflicts of interest that may arise.

Any employee who has any doubts about any of his/her actions or finds that his/her personal interests conflict or may conflict with those of the Group, must follow a more conservative approach and seek the advice of the Human Resources Department.

In cases of co-service of employees related by blood or by marriage up to the third degree, it is recommended that their work be provided in different units, while any relationship of superior-subordinate between them is forbidden.

2.4 Corruption – Financing – Bribery

All Group transactions must be conducted in a lawful and ethical manner, in accordance with applicable legislation and the Group's anti-bribery and corruption policy.

It is prohibited for any employee of the Group or his/her representative, as well as their first degree relative by blood or by marriage or to persons closely related to an employee or representative of the Group, to offer, provide, accept or promise, directly or indirectly, any undue financial or other benefit, to a public and/or private employee, in order to secure favorable treatment or a business advantage. Examples of such benefits may be gifts, money, loans, commissions (fees), rewards or other privileges or benefits.

Any form of corruption, including but not limited to, money laundering and extortion is strictly prohibited and based on the anti-bribery and corruption policy received by the employee. The employee or partner who commits the offense of bribery in the performance of his/her duties, may be charged with civil and criminal liability in accordance with applicable legislation, as well as having his/her employment relationship with the Group terminated.

2.5 Engaging in other work

Employees are not allowed to be employed, in whole or in part, on behalf of another person, under any legal form, or to carry out business activity on their own account, and/or participate in the management or the Boards of Directors of companies, without the prior consent of the Company or of the Group company in which they are employed, except in the case of employees who work part-time, provided the second job is not in a business that competes with the Group companies and does not in any way hinder the employee's uninterrupted employment in the Group company.

No employee is allowed to participate in unions, associations, organizations etc., whose activities conflict or are inconsistent with the interests of the Autohellas Group.

2.6 Transparency of Activities

The staff must observe all the prescribed procedures during the examination and evaluation of every collaboration, purchase - sale of goods, services and selection of suppliers on behalf of the Group.

2.7 Assets of the Group.

Employees must protect the assets of the Group and its available resources must be used only for the intended business purposes and in an appropriate manner, including the security rules indicated by the Group.

The Group's assets include both tangible assets (for example: cash, telephone devices, fax machines, computers, software, applications, e-mail and internet services etc.) and intangible assets (for example: trade secrets, patents, trademarks, intellectual property, information etc.) but also the assets of third parties.

It is not allowed to install and use software programs, which have not been approved / purchased by the Company or the Group companies, on the Group's computers in order to avoid legal obligations of the Company or the Group companies that may arise from any violations of the user licenses (software license agreement violations), as well as for security reasons to avoid viruses (software viruses and Trojans).

Particular care must be taken to avoid loss, damage, unnecessary expense or misuse of the Group's assets. Any fraudulent activity, including the embezzlement and misuse of assets is not tolerated. Perpetrators and accomplices are subject to administrative and legal consequences.

2.8 Public Representation of the Group in the Media – Public Appearances

The public representation of the Group in any form of media (media, social networking media etc.) is decided and implemented by the Management and the departments responsible for this purpose. Therefore, the publication of articles, posts, giving interviews, public appearances or speeches that are connected or can be connected to the Company, require the relevant approval of the employee by the Director of the Department to which the employee belongs.

2.9. Reporting Illegal Activities and Violations of Group Regulations and Policies.

The employee, who becomes aware of any violation of the Code of Ethics or other Group Regulations and Policies, must follow the Company's reporting procedure (whistleblowing) as provided for in the Policy, either anonymously or by name, using any of the tools prescribed therein.

The complaint is then carefully investigated and handled in accordance with the procedures that ensure the confidentiality and privacy of the name of the person making the report, unless otherwise provided for by law.

Failure of the employee to report illegal activity, violation of regulations or even suspicion of fraud, constitutes misconduct and will be treated as such.

The Company and the Group companies prohibit, in any way, retaliation or other action against a Group staff member for reporting a complaint or cases of non-compliance with this Code or even suspicion of illegal behavior.

2.10 Corporate Social Responsibility

The Group integrates social and environmental actions in its business practices, demonstrating in practice a high sense of responsibility towards society as a whole, shareholders, employees and the environment.

Employees: We are committed to and apply modern methods for the development of the Group's human resources, we provide continuous and systematic training programs and apply modern evaluation and reward systems, in order to ensure employees the possibility for continuous development and highlighting of their abilities, recognizing their dedication and contribution.

Shareholders - Investors: We make decisions and operate in accordance with the principles of Corporate Governance, with transparency in decision-making in such a way that today's choices are the foundations of the future.

Society: We have a deep sense of responsibility towards society as a whole and fellow human beings with special needs, through multiple activities and events that are coordinated and monitored directly by the management, thus underling its sensitivity toward them.

Respect for People: The Group respects human dignity and helps the local, national and global society, depending on the subject and its geographical presence. It respects human rights, is opposed to child labor, gives equal rights to men and women, and to national, religious and racial minorities. It chooses partners who accept the same moral values.

Health and Safety in the Workplace: Protecting the health and safety of employees in all our workplaces is a top priority for the Group, which ensures appropriate working conditions and compliance with health and safety legislation with the aim of a safe working environment. Our employees and contractors must respect and comply with the health and safety measures defined by the Group in the safety policy manuals.

Environment: Our goal is to limit and reduce the environmental footprint of our operations and business activities. Applying environmentally friendly policies and procedures throughout the Group's activities, particularly in terms of recycling and environmental management, we make every effort to reduce our environmental footprint, demonstrating the Group's commitment to protecting the environment and sustainable development.

3. Final Provisions.

The Code of Ethics is approved by the Company's Board of Directors, as well as any amendment thereof and governs the operation and companies of the entire Autohellas Group.

Monitoring the implementation of the Code is assigned to the Human Resources Department, which also ensures that:

- It is included in the orientation package for new hires.
- A statement of acceptance and commitment to comply with the principles provided for by all employees is received upon issuance or any amendment thereof.

Autohellas



Any employee who needs advice or guidance on any provision of the Code of Ethics can contact the Human Resources Department.

The Company reserves the right to adjust the above at its discretion.

CODE OF ETHICS OF THE COMPANY AND THE AUTOHELLAS GROUP

I of declare that I have received, read and understood the Autohellas Group Code of Ethics in its entirety.

I undertake to adhere to all standards of ethics describe in the Code of Ethics and understand that if I violate its provisions, disciplinary action may be taken, which may include termination of my employment agreement by Autohellas or the companies belonging to the Autohellas Group, where I am employed.

Date:

Signature:

Name:

Title: