



# **CODE OF CONDUCT**

*Version 1/1.7.2023*



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## 1. Introduction

The Code of Conduct of GLOBE WILLIAMS (hereinafter "the Company") along with the corporate governance rules and policies implemented set out the framework within which we operate.

The Code includes the fundamental principles, rules and values which form the framework of our activities and determine our day-to-day conduct and practice. This set of rules and principles outlines the behaviour we expect from our employees, and the way in which we conduct our business with our clients, suppliers and associates. The purpose of the Code is to guide us in decision-making in cases where dilemmas may arise about how to behave properly and how to address issues relating to the principles and rules of business ethics.

The Code of Conduct sets out guidelines and is not exhaustive. It does not include every possible option, nor does it cover every issue with a full analysis. This Code does not necessarily include all legal and regulatory provisions which may apply to a specific area and in cases of contradictory or conflicting provisions the applicable legal and regulatory framework for each specific area prevails.. The Code must be notified to all employees upon recruitment by the Company.

## 2. Scope

The Code of Conduct and the relevant procedures, measures and policies apply to all workers, employees, officers and senior management of GLOBE WILLIAMS. We also encourage subcontractors, suppliers, associates, consultants and other professional partners to adopt the principles contained in our Company's Code of Conduct.

## 3. Our principles and values

### **Integrity - Corporate Social Responsibility**

We respect the country's laws and regulatory framework, as well as international Corporate Responsibility commitments and initiatives, and act in a highly responsible, ethical manner. We acknowledge our obligation to operate safely, to protect the environment and to support the local communities in which we operate. We actively invest in and contribute to improving the quality of life for all, both inside and outside the company.

### **Commitment**



We take personal responsibility for achieving top class results while at the same time building long-term relations with our clients and suppliers. We focus on the health and safety of our employees and provide a working environment that motivates them to be productive, focused on achieving results, and to manage their personal improvement with dedication and integrity.

### **Focus on results**

We focus on effectively and reliably achieving high-spec solutions for our clients. We show determination and trust in our capabilities to maximise productivity and business excellence, while at the same time maximising value to shareholders.

### **Technological Innovation and Pioneering**

We focus on technological innovation and pioneering to constantly achieve high quality results and added value solutions. We develop an environment of continuous learning and invest in cutting-edge equipment and know-how to promote innovative ideas so that the Company remains constantly ahead.

### **Team spirit**

We are proud to work as a team and to cooperate as partners, supporting each other to achieve common goals, either as team members or team leaders. We have opted to work as a team, capitalising on the skills, ideas and views of each and every one of us in the best possible way. We all work together for the Company's benefit and feel a strong sense of shared responsibility.

### **Meritocracy**

We are fair and transparent in all our dealings. We look at individuals' personalities and skills and place them in posts where they can make the maximum contribution and stand out. We think, act and communicate in a consistent way, acting from a place of integrity.

### **Continuous improvement**

We encourage our people to take initiative. We are responding to the challenges of the present, laying firm foundations for the future. We are seeking to constantly improve our performance, to generate excellent business results. We invest in R&D, cutting-edge technologies, the acquisition of cutting-edge equipment to produce innovative products and provide top quality services.

### **Commitment to targets**

We set clear targets. We operate to the highest standards of business ethics. We add value and maximise value for shareholders and investors.



## **4. Our operating framework**

### **Active bribery**

To maintain our clients' trust, we refrain from engaging in bribery of any type or even in activities which could be interpreted as bribery. We are not allowed to offer, promise or provide any form of unlawful benefit to public officials or decision-makers operating in the private sector in order to achieve preferential handling of our case or influence decision-making for the benefit of the Company. If a public official or decision-maker in the private sector asks us to break this rule, we must inform our superiors about this fact.

### **Passive bribery**

We take business decisions only for the Company's benefit and not for personal gain. We do not allow offers or promises from our suppliers about illegal advantages to affect our business decisions, nor do we accept such offers. Likewise, we do not require that our suppliers provide us with illegal advantages. We want to avoid even the suspicion that such offers affect our business decisions. If they offer us, promise us or provide us with illegal advantages or benefits, we shall inform our superiors about this fact.

### **Commitment to integrity and business ethics.**

The Company is committed to operating with integrity, follows ethical business practices and develops its activities in a transparent and reliable manner. Business ethics does not simply mean some sterile compliance with legal, regulatory, professional and business standards, but primarily entails carrying on business in accordance with the rules of justice, integrity, honesty and respect. Compliance with and observance of the national and EU legislation in force from time to time is a fundamental, non-negotiable principle for all employees. Business ethics is a prerequisite for a modern, high-performing business. The contribution of all employees to maintaining social cohesion and investing in prosperity are vital conditions for long-term, sustainable business activity, and provide the Company with high added value.

### **Occupational Health and Safety**

For GLOBE WILLIAMS, maintaining a healthy and safe working environment for all employees is a top priority. Safeguarding the health of employees by complying with all safety policies and legal obligations, and regularly briefing them about issues relating to health and safety issues are Company primary objectives. We train employees and continuously brief them about health and safety issues in line with Company needs. To ensure better quality occupational health and safety management, the Company has developed and implements a certified Occupational Health and Safety Management System.



## **Environmental Protection**

Our objective is to minimise our impact on the environment, to constantly improve our environmental performance and to promote environmental responsibility as part of our culture. The Company has adopted the precautionary principle in relation to environmental challenges, taking initiatives to promote general environmental responsibility, and encouraging the development and adoption of environmentally-friendly technologies. The Company implements an Environmental Management System certified in accordance with the ISO 14001 standard. We regularly check, monitor and publish data about our environmental performance, placing particular emphasis on evaluating potential risks associated with existing or future products and operations.

## **Data Protection**

In all business procedures, we guarantee privacy protection in compliance with applicable law. All business or commercial information, commercial secrets and other exclusive information about the Company, contracts, projects, financial data, clients, suppliers and associates must be treated as confidential information. Such information should not be disclosed to persons or organisations outside the Company or to Company employees who do not have the appropriate authorisation. While working at GLOBE WILLIAMS and after the employment termination, employees must not disclose confidential information to third parties but must handle business and confidential information with the utmost discretion.

## **Conflicts of interest**

Conflicts of interest arise when the personal interests of an officer, employee or associate of the Company may directly or indirectly compete with the Company's interests. It is clear that a conflict of interest is any event which could affect our ability to provide an objective and impartial professional opinion. We should not put ourselves in the situation where we would be tempted to take any business decision for GLOBE WILLIAMS which would place our personal interests above those of the Company. Any employee who realises that he/she is in a conflict of interest situation should immediately inform his/her supervisor. Management, acting in cooperation with the legal department, will decide what needs to be done and how the employee should handle the specific situation.

## **IT System security**

The availability and integrity of the Group's IT systems is of fundamental importance. Personal and professional data are protected against unauthorised access, loss or manipulation using all technical means available under the applicable national law.

## **Equal opportunities**



The Company ensures that it offers equal opportunities to all employees and associates both in terms of selection when recruited and when being selected for promotions and when filling vacant managerial posts. The value, qualifications and performance of individuals are the main reasons for assigning them more complex and demanding roles within the organisational chart, while characteristics related to gender, religion, age, origin and colour, or the beliefs of candidates are not grounds for qualifying or disqualifying them compared to their fellow candidates.

#### **Trade name and trademarks**

The Company's corporate name, distinctive title and commercial names and lawfully registered trademarks (whether Greek, community or international) are important assets which require proper and responsible use and protection from any infringement, no matter what form that takes. All Company employees are obliged to promptly notify Company Management without undue delay of any attempt, which comes to their attention, to infringe, counterfeit, copy or misappropriate the Company's trade marks and/or distinctive title and/or trade names.

#### **Assets and facilities**

The Company's assets and facilities must be used in a suitable manner and only for the stipulated business purposes. All Company employees are obliged to use all Company assets and facilities in a proper and careful manner, and are responsible for the safe use and safeguarding of all assets entrusted to them, and it is an imperative duty of all employees to promptly report theft, loss, destruction, misuse or abuse of any Company asset.

#### **Financial and non-financial information**

The integrity of financial reports is critical for Company management and for proper and accurate disclosure of its financial data. All Company financial transactions are recorded and published in accordance with generally accepted accounting standards and principles and the accounting records present the nature of transactions in a fair and non-misleading manner. GLOBE WILLIAMS displays true information in good time which is transparent, relevant, comprehensive and correct. We also consider that non-financial reporting is a critical tool for stakeholder consultation and participation and we are committed to reporting regularly on our non-financial performance, in line with international standards and best practices, to ensure transparency and to build trust with all stakeholders.

### **5. Availability of the Code of Conduct**

This GLOBE WILLIAMS Code of Conduct has been approved by the Company's Board of Directors. It applies to all Company staff without any amendment and takes effect within 10 days from approval in accordance with the above. A copy of this Code is also posted on the Company's notice board. The Company may, at its discretion, select any other



appropriate means for disseminating the Code. Company employees may contact the supervisor to whom they report or Company Management for any clarifications or explanations about the Code. Any Company employee may receive a hard copy of the Code upon request. This Code is incorporated into all Company contracts with officers and employees and constitutes a regulatory framework governing the relevant relations. It is an integral part of any employment contract of any type which is to be entered into after the Code takes effect.

### **Application of the principles of the Code**

The GLOBE WILLIAMS Code of Conduct collates and sets out in writing the basic principles and rules which the Company has applied since its incorporation, and to which it owes its success. It frames corporate culture and shapes business ethics and is distributed to all new recruits and associates of the Company. This Code is addressed to and binding on both members of the Management team and Company officers, employees and associates and all persons in general who provide services to GLOBE WILLIAMS, without any exception or derogation. We are all obliged to implement its rules and ensure that all associates comply with them.

### **Reporting violations**

Failure to comply with and implement the Code is a violation which entails sanctions for the person who breached his/her obligations arising from the rules set out in the Code. To more effectively implement the Code and avoid sanctions being imposed, we urge officers, employees and all persons in general who provide services to GLOBE WILLIAMS to freely report to Management any conduct or act which may deviate from the proper one. That is the only way to ensure that the rules which describe the standard of business conduct to which we hold ourselves to continue to be systematically implemented by all GLOBE WILLIAMS' staff.

### **Protection against retaliation**

GLOBE WILLIAMS will not take, nor tolerate the taking of, any negative measure against any natural or legal person who files complaints, grievances or reports about violation of a law, rule, regulation, internal policy or this Code, or for their participation in the investigation of a potential violation of the above. However, the Company reserves the right to take any measure it considers appropriate against an officer, employee or associate when it is proven that they deliberately and intentionally defamed another person or provided false information to the Company or third parties about violation of the Code.

On behalf of Management