

METALS SOLUTIONS

MAILLIS



MAILLIS **Code of Conduct**

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The code of conduct outlines the general principles and rules of conduct of all MAILLIS's employees.

The main purpose of the code of conduct is to ensure that our employees act responsibly and in a manner that will reflect favorably on them and on the Company.

This code of conduct should be treated as a guideline of the acceptable rules of conduct between the employees of the Company, as well as between the employees of the Company and third parties, either natural or legal entities, operating in Greece or abroad.

1. GENERAL CONDUCT

Employees should always conduct their duties in a professional manner and always be aware that their actions have a direct impact on the public's perception of the Company.

Maillis Company requires all employees to use their judgement, be accountable for their actions and conduct business with honesty and integrity.

Preserving Maillis Company core values and general business principles contributes to build and maintain healthy relationships both within the Company and with third parties, which is key to the success of Maillis Company.

2. COMPLYING WITH ALL APPLICABLE LAWS AND REGULATIONS

All employees are responsible for complying with all applicable laws and regulations of each country where their business is regulated under all circumstances.

3. ANTI CORRUPTION OBLIGATION

All employees should perform their duties in a lawful and ethical manner, in accordance with the applicable laws, and particularly the provisions of the UN Convention against Corruption (Please refer to https://www.unodc.org/unodc/en/corruption/tools_and_publications/UN-convention-against-corruption.html)

Specifically, the employees are prohibited from offering, providing, accepting, or promising, directly or indirectly, any unlawful commission, bribe, or benefit of any type or personal favors to any public or government official with the intention to obtain personal benefit or corporate advantage through unfair and illegal means.

4. CONFLICT OF INTEREST

All employees and their immediate families should avoid any situation that may create conflict between their personal interests and the interests of the Company. They must make impartial and objective decisions on behalf of the Company and ensure that their actions are in the best interest of the Company. If any employee is in doubt about the existence or not of a conflict, it is his/her responsibility to address this matter to his/her immediate supervisor or to the

Company's legal counsel.

Specifically, the employees should not accept or give any gift or loan to a current or potential customer or supplier or any third party.

Furthermore, employees should not conduct business other than for the Maillis Company or use Company property to conduct business for any third party.

Any personal relationship with any fellow employee, customer or supplier should be disclosed to the human resources department of the Company.

Employees should not perform services with or without compensation to any competitor of the Company.

5. FINANCIAL INTERESTS

Maillis Company employees should not take a financial interest in a company that is closely related (competitor, supplier, customer) to our business. Neither Maillis Company employees nor an immediate employee's family member should have any business, financial or other relationship with customers, suppliers, competitors, which may affect or appear to interfere with their professional duties.

6. RESPECTING ANTITRUST LAWS

Employees must not engage in any action that limits competition (price fixing etc). If anyone needs detailed information about antitrust laws or needs legal advice, please contact our legal department. Penalties for non-compliance are extraordinarily severe.

7. FINANCIAL TRANSPARENCY

Any books, financial statements, corporate accounts and consolidated accounts of the Company and the various affiliates should reflect the transactions carried out with precision, honesty and integrity. Financial statements should be compiled according to applicable accounting procedures while respecting internal reporting and internal control procedures. This is also applicable to internal procedures of expense reports, requests for holiday etc.

8. POSITIVE ENVIRONMENT & RESPECT FOR FELLOW EMPLOYEES

Maillis Company prohibits any form of harassment of employees by fellow employees. Any abusive behavior in the workplace towards any person or Group's property will not be tolerated.

Sexual harassment can be verbal, physical or visual and has the effect of creating an offensive, hostile and intimidating environment. Sexual harassment is not an acceptable behavior.

Maillis Company prohibits child labor, the exploitation of minors for labor as well as all types of forced labor and/or undeclared employment.

Maillis Company is committed to a policy of non-discrimination in employment and offers equal employment and advancement opportunities for all.

Maillis Company will comply with all international laws prohibiting discrimination against any employee based on religion, race, gender, sexual orientation, age, disability or medical condition including pregnancy.

9. HEALTH & SAFETY

Maillis Company is committed to providing a safe working environment for all employees complying with applicable laws and regulations. Employees should report any workplace hazard and comply with any health and safety regulations the Company enforces. Furthermore, all employees are obliged to participate in any health and safety training provided by the Company. The aim of the Company is to safeguard and achieve a healthy work environment free of accidents.

10. ENVIRONMENT

Maillis Company considers that environmentally responsible action is an essential part of sustainable business growth. All employees of Maillis Company should recognize their responsibility to continually try to reduce the environmental impact of the work we do and the

products we create. Environmental considerations should be an integral part of our business practices.

11. PROPERTY AND EQUIPMENT

All employees should take precautions to maintain the security and proper condition of the Company's property.

Employees must ensure that they have permission of their manager before removing from the site any tools, equipment or materials belonging to the Company or employed contractor.

All employees are expected to use software and electronic and other communication means of the Company in a lawful way as to protect the intellectual property or any personal information of 3rd parties as well as to respect the personality of others.

12. CONFIDENTIAL INFORMATION

In the course of their duties' employees may be privileged to confidential information relating to the Company's manufacture practices, sales and marketing programs, plans and strategies, financial data and other data related to the Company's business that should not be further disclosed. Employees should not under any circumstance divulge this confidential information to parties that are not entitled to it except as required in the course of their employment. Employees should protect Company information including inside information.

13. DATA PROTECTION

Maillis Company collects and use personal data of their employees, BoD members, directors, and any third parties providing services or contracting directly or indirectly with Maillis Company, including customers and suppliers. Such data may include amongst others, i.e. name of representative, business address, email address and telephone number, information about their cooperation with the Company. Said processing of personal data is conducted to the extent that it is necessary for the performance of the business operations of Maillis Company and in compliance with the applicable legal provisions. All employees should familiarize themselves with the Company's GDPR Privacy Notice for the collection and use of personal data, which outlines

how personal data held by the Company should be handled. For further support email: dpoteam@maillis.com

14. MEDIA RELATIONS

Employees should not come into any contact with the media, including giving interviews for any purpose connected to the Company without prior appropriate approval.

15. RELATIONS WITH CUSTOMERS AND SUPPLIERS

Our relations with customers and suppliers must be based on trust, fairness and honesty. When dealing with customers, all employees should provide products and services of the highest quality and behave in an honest and forthright manner.

As regards the choice of the Company's suppliers, all employees should choose and retain suppliers who achieve and maintain the same standards of quality and integrity to which Maillis Company is engaged to.