



# **CODE OF CONDUCT**

**JANUARY 2020**

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## Message from the Management

PPA SA's positive growth prospects in an environment of ever-increasing challenges make responsible business and individual behavior, throughout the Company, more necessary than ever.

In this context, we have formulated the PPA SA Code of Conduct, which outlines the principles by which every person involved in the productive operation of the Company and all of its corporate bodies must act within the scope of its duties. All individual and collective actions must be guided and governed by these principles to ensure consistency and continuity, essential components for a successful and growth path.

The Code is valid and binding for all employees and serves the interests of shareholders, staff, suppliers, associates, financial institutions, society and the national economy.

Through the adoption of principles and corporate values of China Cosco Shipping, PPA SA has expressed its commitment to integrity and to maintain a high level of ethical conduct, and promises to always strive to remain faithful to its Principles by ensuring its prestige and competitiveness.

For this reason, everyone's contribution is crucial to making the Code a part of a responsible Corporate Culture and a vehicle for the further prosperity of the Company.

YU Zeng Gang

Chairman of the BoD

## 1. Introduction

### 1.1. About the Code of Conduct

The Code of Conduct (hereinafter “the Code”) was adopted by the Societe Anonyme under the corporate title Piraeus Port Authority S.A. (hereinafter “the Company”) by virtue of the 17.01.2020 decision of its Administration Board. The purpose of the Code is to promote a common corporate culture within the Company. This corporate culture indicates that our business conduct should be in accordance with the best practices in business ethics with the applicable legislation, in the areas of human rights, labor, environment and anti-corruption.

The Code includes fundamental principles, rules and values that shape the context of our day-to-day business conduct and practices. These principles and rules set our expectations with respect to our staff members’ behavior as well as the way in which we conduct our business activities with our clients, suppliers and other business partners.

The Code’s purpose is to guide our decisions when we face dilemmas relevant to Business Ethics.

Our aim is to ensure compliance with the business ethics and conduct principles adopted by the Company in connection with all our business partners (such as subcontractors, suppliers and other external associates).

We should carefully study the Code and consider the following:

- The Code does not cover every possible situation that could be encountered, nor does it provide a complete analysis of every topic. When faced with an uncertain situation or an unclear course of action, we must seek advice from our Manager, and/or the Company’s Internal Audit Service before taking any action.
- Certain topics referred to in this Code are and will be covered in greater detail in individual policies and internal procedures of the Company.

The present Code does not necessarily cover all the legal and regulatory provisions that may apply in a specific topic.

The Code will be notified to all existing and newly hired staff members of the Company. Furthermore the Code is available in our corporate web site and intranet (when it will go live) so as to be readily accessible to our staff members and business partners.

The Company believes that honesty, integrity and fair play are important values of the Company as well as the key factors in maintaining sustainable development of the Company. The Code is hereby designed to safeguard the interests of the Company and its shareholders, forge good corporate image and harmonious corporate culture, and regulate the routine occupational behaviors of the Company’s staff in accordance with the Articles of Incorporation of the Company and the applicable laws and regulations in Greece and EU.

### 1.2. Objective and Applicable Scope

The objective of defining this Code is to translate the philosophies and principles of the Company into a set of formal written rules and procedures. This Code sets out the standards of behavior expected from the Company and the guidelines on how to handle different situations in business dealings.

This Code applies to all part-time and fixed-term staff members of the Company, both inside and outside Greece.

As staff members of the Company, we are all collectively responsible for upholding the values, principles and rules of this Code of Conduct in order to ensure that the key values of our Company are communicated with our subcontractors, suppliers, business partners, and the Company's agents.

All Departments throughout the Company must uphold and protect these principles and values. It is imperative that each one of us has a thorough understanding of the required ethical business conduct, as well as the consequences of non-compliance.

## 2. Our Corporate Culture

### 2.1. Our Values

#### Honesty and Integrity

- We conduct all of our professional and business activities with honesty and integrity, placing the Company's interests above any personal benefit.
- We promote transparency and open communication in the services we provide, based on our expertise and our experience.

#### Confidentiality

- We are committed to protection and proper use of information and personal data related to our Company, our staff members, our clients, our partners and investors.
- We do not disclose any information without the required legal or professional right to do so.

#### Equality

- We respect diversity and promote equal opportunities in the workplace.

#### Objectivity

- We act objectively towards our colleagues and do not allow bias, conflicts of interest and undue influence of third parties to affect our professional judgement.
- We value flexibility, innovation and entrepreneurship. We respect differences of opinions and we treat them constructively and professionally.

#### Fair Business Practices

- We do not compete with unfair means, we respect our competitors and we apply fair business practices.

#### Creativity

- We promote creativity and innovation in all of our activities.
- We encourage the development of new ideas and solutions that add value and improve the quality of our services.

#### Responsibility

- We act responsibly and in accordance with our shared values taking responsibility for our decisions and conduct in general.

#### Respect for Society and the Environment

- We recognize our environmental responsibility and we strive to reduce the environmental impact of our operations.

- We respect society, do not take actions that could cause damage to the society and we support contribution to the communities in which we operate.

### **Respect for the staff colleagues**

- We respect our staff colleagues, do not take actions that could cause damage to them and we support them in order to achieve Company's goals. We show zero tolerance to abusive language and insulting behavior.

## **2.2. Our Responsibilities**

### **We acknowledge that we have a responsibility:**

- To protect the investment of our shareholders and investors,
- To offer high-quality services to our clients,
- To respect the rights of our staff members, to compensate them fairly and competitively and to encourage them to participate in the development and control of their work,
- To pursue mutually beneficial relationships with our partners and suppliers,
- To conduct our activities respecting the law, our role as members of the society, health, safety and environmental protection regulations and promoting sustainable development.

### **Our Company's Managers main responsibility is the implementation of the present Code. In particular they should:**

- Demonstrate a commitment to ethics and conduct themselves in accordance with the principles of business ethics.
- Foster an environment of honesty and transparency in which all staff members feel comfortable discussing issues and reporting potential compliance violations.
- Take immediate action when staff members raise concerns or provide notification about Code violations and provide immediate guidance to staff members, when requested.
- Ensure that staff members are trained on ethical issues on an ongoing basis.
- Answer all staff members' questions regarding the Code's principles, as well as the Company's values, policies and procedures.

### **Our Company's staff members' main responsibility is the implementation of the present Code. In particular they should:**

- Demonstrate a commitment to moral values and conduct themselves in accordance with the principles of business ethics.
- Operate in an environment of honesty and transparency in which they feel comfortable discussing issues with Managers and reporting potential compliance violations.
- Raise concerns or provide notification about Code violations to Managers and seek immediate guidance from Managers, when needed.
- Ensure that they are up-to-date with the ethical issues on an ongoing basis.
- Always follow the directions given by the Managers, providing that these directions do not oppose to Decisions and Regulations approved by the Management, or to the law.

### 3. Compliance with Legislation

Our key principle is to comply with laws and regulations.

While carrying out our business, we are all responsible for respecting and upholding the law. Ignorance of law is not justifiable. We should be informed on law provisions that directly relate to our job requirements.

We have zero tolerance for any type of order that does not comply with the law.

In the event that we require any clarifications regarding the legal or regulatory framework, we must direct our questions to the Company's Legal Department and/or the Internal Audit Service.

### 4. Principle of Accepting Advantages

**4.1.** Staff members of the Company are committed to upholding the principles of integrity and fairness, and conducting all business without undue influence.

#### 4.2. Principle of Accepting Gifts

**4.2.1.** Giving and accepting gifts within the Company are in principle not allowed by the Company.

**4.2.2.** Staff members of the Company are prohibited from soliciting or accepting any advantages from any person having business dealings with the Company (e.g. clients, suppliers, contractors etc.). However, they are allowed to accept (but not solicit) the following gifts offered voluntarily:

- Advertising or promotional gifts of value as defined in the article 4.2.4 (usually means gifts bearing company's name or logo, such as diaries, with limited commercial value); or
- Gifts given on festive or special occasions (e.g. festive gift coupons for Christmas and New Year etc).

**4.2.3.** Staff members should decline an offer of a gift if acceptance of it could affect their objectivity in making business decisions, or induce them to act against the interest of the Company, or lead to allegations of impropriety.

**4.2.4.** Any staff member who receives or is offered gifts valued at more than 100€ (or equivalent) must declare it in written (see attached Form A) to the relevant DCEO/Assistant CEO and the Internal Audit Service Manager.

#### 4.3. Principle of Accepting Entertainment

**4.3.1.** Although entertainment is an acceptable form of business and social behavior, staff must not accept the following entertainment from persons with whom the Company has business dealings (e.g. customers, suppliers or contractors etc):

- Excessive or frequent entertainment – taking into account its value, substance, frequency and nature;
- Inappropriate entertainment – taking into account the relationship between the staff and the donor (e.g. whether they have any direct official dealings); or
- Any entertainment that is likely to lead to the embarrassment of the staff reputation in the discharge of his or her functions, or bring the staff or the Company into disrepute, or lead to any real or apparent conflict of interest.

**4.3.2.** Free trips or traveling expenses are not included in the definition of "entertainment" but are considered as "advantages" (article 5). Without the prior consent of the Company, staff members are not allowed to accept these advantages.

**4.3.3.** Staff members are prohibited from accepting any cash gift, marketable securities or cash disbursements from any Supervisory Authority or its representative..

### 5. Principle of Offering Advantages or Gifts

**5.1.** Good judgement and practice moderation have to be implemented in giving and receiving business gifts and entertainment. The value, frequency and nature of such events should not be excessive, so as to avoid even the appearance of impropriety.

**5.2.** Gifts and entertainment must be offered only in connection with legitimate business interests and purposes. Proper use of budget, approval, record-keeping and documentation procedures must be made when expensing business gifts and entertainment. Gifts are provided by PPA SA for the strengthening and consolidation of Public Relations or Business Transactions and granted to representatives of companies and / or affiliated companies, as well as delegations visiting the PPA SA installations.

**5.3.** The offering of Gifts will be only made after the submission of a relevant request by the Department concerned in accordance with the Company's external business needs and the preparation by the Administration Department of a plan for the implementation of the relevant commission approved by the Manager of the Department. The process of approving the award of a gift (depending on its value) is described in detail in the PPA SA Regulation for Management of Corporate Gifts.

**5.4.** When offering gifts/entertainment with organizations that have more restrictive limits or prohibitions against accepting business gifts and entertainment, staff members should abide by their standards.

**5.5.** The Administration Department is responsible for the management of Corporate Gifts by appointing a competent person as an Administrator and its Deputy. The procedure for purchase / collection / records keeping of gifts offering is described on the issued PPA SA Regulation for Management of Corporate Gifts.

**5.6.** In principle staff members are prohibited under whatsoever excuse making offer to any supervisory office or its officer of any gift of cash, marketable securities or cash disbursement vouchers.

### 6. Principles of avoiding Conflicts of Interests

**6.1.** A conflict of interest situation arises when the private interest of a staff member competes or conflicts with the interest of the Company. Private interest includes both the financial and personal interests of staff members and those of their connections. Connections include parents, grandparents, children, siblings, relatives, and close personal friends.

**6.2.** The business decisions and behaviors of the Company should be made based on the best interests of the Company and shareholders instead of the personal considerations of staff members. Staff members should avoid any situation which may lead to an actual or perceived conflict of interest. Failure to do so or make a declaration in writing according to the article 6.5.1 may give rise to criticism of favoritism, abuse of authority or even allegations of corruption.

**6.3.** The followings are the most common types of conflict of interest situations (including but not limited to):

- Any act or any interests of the staff that may directly or indirectly impair his or her fair and efficient performance of duties;
- Staff or his or her family members receive any improper personal benefits as a result of his or her position in the company;



- Having undeclared financial interests in any supplier, contractor or parties that do business with the Company;
- Offering assistance to the Company's competitors through taking on part-time employment or consultancy service;
- Engaging covertly in provision of services or production of goods in competition with the Company;
- Performing outside work on the Company's premises and using the Company's time and assets; and
- Giving unduly favorable treatment to particular supplier, contractor, customer, job applicant or subordinate for personal reasons.

#### 6.4. Staff members should not:

- Bribe others or receive bribe or other unlawful income through use of position in the Company;
- Take for themselves personally or family members or other parties any unlawful or improper benefits through the use of position in the Company;
- Take away or help others to take away business opportunities of the Company by taking advantage of the position or resources in the Company, unless the Company has known and waived such opportunity in writing;
- Seek for personal gains in any way by using the corporate assets;
- Participate in, personally or jointly with other parties or for the benefit of other parties, any business competitive with any line of business conducted by the Company;
- Engage in any other act that may impair the interests of the Company.

**6.5.1.** If there is any actual or potential conflict of interests in performing duties, staff should declare to the Internal Audit Service in writing (via email at [olp-audit@olp.gr](mailto:olp-audit@olp.gr)) and follow its directions.

**6.5.2.** Any staff should report to the Internal Audit Service Manager of the Company if he notes any circumstance of conflict of interest.

## 7. Loans

Staff members or their family members should not grant or guarantee a loan to, or accept a loan from or through the assistance of, any individual or entity having business dealings with the Company. There is, however, no restriction on normal bank lending.

## 8. Principle of Handling Confidential Information/ Company Property

**8.1.** Staff members are prohibited from disclosing any confidential information classified by the Company to anybody. Those who have access to or are in control of such information shall at all times ensure its security and prevent from any abuse or misuse of the information. Examples of misuse include disclosure of information in return for monetary rewards, or use of information for personal financial gains.

**8.2.** Staff members are prohibited from appropriating Company property, including fixed assets, office equipment, raw materials and finished goods (if applicable) for personal use or resale as second hand equipment or scrap or recycle. All Company property shall be used only for conducting the Company's business or for purposes authorized by the management.

**8.3.** The Company's image is directly linked to our behavior. Therefore, we must act in the best interest of the Company, expressing ourselves in accordance with our values in our everyday professional conduct. In this context, we do not disclose information, either verbally or in writing on behalf of the Company, unless we have received authorization to do so. We do not use any printed or electronic material bearing the Company's or its companies' corporate logo to express personal views or for personal activities. Furthermore, information concerning the Company should be provided in a truthful and consistent manner, in accordance with our Company's policies only by staff members who are delegated.

**8.4.** Unauthorized disclosure of information may damage our Company's reputation, integrity and image and may raise claims for compensation for damages. Only representatives of the Company, who are authorized to communicate and provide data and information about the Company to the public, analysts, financiers and the media may make statements or provide such data and information.

**8.5.** In this context, we do not provide any corporate information or news that is not publicly disclosed. Any questions from the media or other third parties must be directed to the authorized individuals, responsible for addressing these questions and providing answers.

**8.6.** We must fully cooperate with any request by judicial authorities, especially as far as it concerns disclosure of corporate information or personal data, always under the guidance of our Company's Legal Department.

**8.7.** We should uphold the following principles concerning the use of social media:

- We should be careful in the way we express opinions and personal beliefs and we should not give the impression, by any means, that these are the opinions of the Company or are in any way directly or indirectly related to the Company
- We understand that the way we present ourselves not only reflects our image but that of the Company as well.
- We are not permitted to provide or disclose information and, in particular, confidential information and trade secrets of the Company which we are aware of, in the context of our employment with the Company. Furthermore, we do not engage in unauthorized discussions related to the business activities and plans and internal procedures of our Company.
- We are not permitted to publish offensive content or inappropriate comments about the Company or our colleagues.
- We should comply with the related policies of our Company and report any events that have come to our attention regarding violations of these policies to the Internal Audit Service, through the applicable Internal Complaints procedure.

**8.8.** We should uphold the following principles concerning Public Speeches, use of social media and Signed Publications:

- We inform and receive approval from Management prior to delivering any speech as representatives of the Company, in order to receive supporting material and, if necessary, relevant guidance.
- We inform and receive approval from Management prior to publishing any signed statement or press release, in order to ensure that the content does not contradict the strategic direction of the Company and that it does not threaten the Company's image. Any scientific or similar study or

report or expression of scientific or social or political views and opinions may be expressed only on the condition that it is declared and clarified that they express only personal point of view and they do not represent PPA.

- We avoid expressing opinions or providing answers to questions when these do not fall under our area of expertise.

**8.9.** If, due to our professional capacity, we have access to insider information that may affect the price of shares or other financial instruments of the Company or any of its affiliates which are listed on a regulated stock market; we must respect the confidentiality of such information. Accordingly, we are obliged to refrain from any transaction with respect to such shares, for our own account or on behalf of any other third party, by taking advantage of such information. In general, we must fully comply with the applicable legislation regarding the use of insider information.

**8.10.** All Members of Management and all employees that would like to purchase shares of the Company or sell shares of the Company they already have in their possession, they should at all times comply with the International Regulations regarding “*Insider Trading*” and the applicable laws and related Decisions of the Hellenic Capital Market Commission.

## 9. Relations with Suppliers and Contractors

**9.1.** The Company when awarding contracts is fulfilling an express obligation imposed by law to comply with the principles of transparency, publicity, equal treatment and non-discrimination, in accordance with the each time applicable Regulation.

**9.2.** The Company is committed to maintaining good relations and communications with suppliers and contractors. When selecting suppliers, the Company should ensure fair competition or bidding, and make comprehensive, independent, objective and fair consideration of the supplier qualification, product or service quality, business credit, quotation and after-sales services via bid invitation or other fair/reasonable means in light of the each time applicable Regulatory Framework.

**9.3.** The contracts awarding and the purchase of goods should be conducted according to the following:

- Impartial selection of capable and responsible suppliers and contractors;
- Maximum use of competition in accordance with PPA’s Regulation and under the terms of the Hellenic Republic Concession Agreement;
- Selection of appropriate contract types according to need;
- Compliance with laws, relevant regulations and contractual obligations; and
- Adoption of an effective monitoring system and management controls to detect and prevent bribery, fraud or other malpractice in the procurement and tendering process.

**9.4.** Those staff members involved in the selection of suppliers and contractors should avoid any misuse of authority or engage in situations which could affect or appear to affect their ability to make free and independent decisions regarding the purchase and procurement of goods and services and to implement the Company’s policy for the acceptance of the advantages set out in article 5 above

**9.5.** Staff members involved in the selection of and purchase from suppliers or contractors should make a declaration when there is any actual or potential conflict of interests in performing the duties. See related articles 6.5.1 above for details.

9.6. Staff members involved in the selection of and purchase from suppliers or contractors should avoid leaking information of value, e.g. supplier quotation, tender prices, etc.

### 10. Relations with Customers

10.1. Staff members are committed to providing high quality services and products to maintain Company's customer satisfaction, and to developing and securing long-term relationships with customers based on mutual benefits for the Company

10.2. Staff members should conform to the sales policy and prepare sales contracts exactly in accordance with the terms and conditions included in the respective company's Regulations and Tariffs. Pocketing customer discounts or offering discounts to ineligible customers is prohibited.

10.3. Staff members involved in sales should promptly and accurately update the official accounting books, in accordance with the Company policy.

10.4. It is forbidden to build relationships with customers through bribery, illegal discounts and other illegal means that will have a negative impact on the Company

10.5. Staff members involved in sales and marketing should not divert the business of the Company without approval (indicatively but not restrictively to business competitors or associates with close relationship with the staff members). Staff members should make a declaration when any actual or potential conflict of interests arises in performing duties. See related articles for details.

10.6. Staff members are committed to protecting the information of customers from leaking. The information should be used in the proper context only for authorized business purposes and shall be accessible only to those who have a legitimate need to know.

### 11. Relations with Public Officials and Regulatory Authorities

11.1. Given its international and diversified nature, our Company is subjected to various national and EU laws and regulations. We must comply with all legal and contractual obligations imposed by legislation and regulatory authorities in the EU. Anyone who contacts Public Officials and negotiates agreements is responsible for knowing and complying with all applicable laws and regulations.

11.2. Our contact and relationships with Public Officials must not jeopardize our Company's reputation. Particular emphasis should be given to situations that may be considered as bribery on behalf of the Company.

### 12. Donations & Political Contributions

12.1. As a responsible member of society, the Company takes social responsibility initiatives. The Company acts as a supporter and sponsor of education, science, culture, activities relating to social responsibility, sports and environment protection on a large scale, all on the basis of the specific local laws and its internal policies and regulations with regard to its financial possibilities. This support is being shaped by partnerships, cash and non-cash donations, and services. The Company makes no donations in order to obtain any commercial advantage. Donations to individuals or private accounts as well as individuals or organizations that could potentially damage either the Company's interests or image will not be granted.

**12.2.** The Company does not donate any money to political parties or elected officials, and does not grant them any non-cash benefits beyond what is legally permissible.

### 13. Fraud

**13.1.** Fraud is a deliberate act or omission committed by an individual, in order for that individual or a third party to obtain an illegal monetary gain, harming 3rd party property to which he/she is not entitled, by presenting false information as facts, or purposely concealing facts.

**13.2.** Fraud can be committed by one or more individuals and can involve staff members or third parties (clients, suppliers, subcontractors, etc.). The person committing the fraud may seek a direct gain or an indirect gain such as power, influence, promotion or bonuses at the expense of the Company, its profits, staff members, shareholders, suppliers or its clients.

**13.3.** We show zero tolerance for any type of fraud, as well as any actions or omissions that may expose us to potential fraud.

**13.4.** We must report all incidents of potential fraud or situations that may expose our Company to potential fraud to the Internal Audit Service via email at [olp-audit@olp.gr](mailto:olp-audit@olp.gr).

### 14. Money Laundering

The Company takes all necessary measures to prevent money laundering activities within its sphere of influence.

### 15. Equal Opportunities Policy

**15.1.** We foster a working environment which respects equality, personal rights and diversity, either based on visible characteristics such as age, sex, race, ethnicity and physical ability or non-visible such as culture, religion, marital status, experience and opinion.

**15.2.** We behave in a fair and equal manner towards all staff members and job applicants of the Company, ensuring equal opportunities for development and advancement. We do not tolerate any form of discrimination or harassment in the workplace and we must, therefore, comply with the current legislation on equal opportunities in the workplace, including those related to non-discrimination, harassment and retaliation.

### 16. Forced and child labor

We do not use any form of forced or child labor. Child labor is defined as hiring any individual who is under the legal age of employment in the country in which we are operating.

### 17. Harassment in the workplace

**17.1.** Harassment refers to any behavior that is potentially offensive, aggressive, or violates or disturbs any staff members' sensitivity or dignity and/or isolates staff members.

**17.2.** All forms of harassment are strictly forbidden. We do not tolerate harassment and behavior which offends the personality, and/or creates an intimidating, hostile or humiliating environment (e.g. physical, sexual, psychological, verbal or other form of harassment).

### 18. Environmental Protection Policy

**18.1.** We are committed to operate with responsibility and respect towards the environment and society. The environmental management of our operation is one of our most significant objectives and it is a requirement for the ongoing viability of our Company's activities. In all of our activities and projects, we strive to consistently apply the highest environmental standards in connection with, among others, energy consumption, waste management and the maintenance and protection of natural resources.

**18.2.** The Company must work in a consistent way to understand customers' needs and expectations, to continually improve the level of services provided and to address the environmental challenges emerged in daily operation. According to the Company's Quality & Environmental Policy the company is committed to improving environmental performance and setting quality & environmental objectives to address risks and opportunities and significant environmental aspects. Through the environmental management of projects and services, we focus on sustainable development; we protect the environment and measure our environmental impact in all environmental parameters.

**18.3.** We are committed to fully comply with all environmental legislation, including award and retention of all required environmental permits and approvals for our business activity.

**18.4.** The Company must maintain and, if required, update programs for the monitoring of air quality, of the quality of the sea water around the Port area and of noise monitoring covering the entire Port area and undertakes the appropriate counter-measures if it is necessary to confront potential negative measurements.

**18.5.** The Company must apply and, if necessary, update the systems of collection, recycling and management of waste produced from its activity (including the liquid and solid waste collected from the vessels that use the Port area), in order to recycle more and minimize the waste that finally ends up in landfills.

**18.6.** Through the environmental certifications of our Company, we substantiate the limited environmental impact of our projects, since we continuously monitor and take improving actions concerning energy consumption, water quality and protection of natural resources, ending up to a more people-friendly port. Therefore, the Company must maintain environmental management certifications (e.g. according to ISO 14001:2015) as a sign of commitment of the Company to best practices for environmental management and prevention of pollution.

### 19. Internal Complaint Process

**19.1.** The Internal Complaint Process alters its current form. The previous CEO decision 1131/9-11-2017 is cancelled with immediate effect and the Internal Complaint Process is embedded as part of this Code in the below articles.

**19.2.** As part of good governance policy and respect to company's shareholders PPA SA see every complaint as an opportunity to assess business processes and improve them wherever possible. It is believed that the update of the Internal Complaint Process (ICP) will offer the chance to get a feedback on the business activities/operation and will serve as a quick and efficient means of resolving any difficulties if they arise and will promote good relations and communication between the Company and its employees. The fundamental nature of PPA SA ICP is to resolve complaints quickly once the facts, evidence and circumstances are established.

**19.3.** PPA SA ICP is based on the following characteristics which are regarded as providing a successful dispute resolution scheme:

**Accessibility:** The complaints process is easy to find, understand and use.

**Confidentiality:** Information about a complaint is only provided to those people who need to know about it, in order for the complaint to be actioned properly.

**Independence:** Designated persons who will receive the submitted complaints will be independent from the area of business that is being complained about.

**Fairness :** The complaints process will ensure all the parties' submissions are given equal weight and respect.

**Transparency:** The complaint process and its possible outcomes should be clearly explained and those involved should be kept informed of the progress of the complaint.

**Accountability:** The complaint process will identify who is responsible for handling complaints and for implementing any improvements identified via a complaint.

**Efficiency:** The complaint process has set timeframes regarding response times, and resolution targets.

**19.4.** All complaints, will be investigated in a fair manner, under confidentiality, by collecting and reviewing all relevant data and information relevant to the specific complaint and potential conflicts of interest that may be relevant to the complaint investigation process (e.g. participation in the investigation of a person involved in complaints about the complaint), should be identified and the necessary measures will be taken. Through continuous analysis of data related to the handling of any complaints, potential systematic problems and legal and operational risks will be identified and addressed, while the cause of the specific type of complaint will be examined to ensure that the necessary measures are taken to avoid repetition.

**19.5.** An internal complaint is an expression of dissatisfaction about the services / activities / operations / procedures / regulations / behavior provided by the Company and its employees, including misconducts which involve misappropriation of company assets.

**19.6.** A formal internal complaint arises when an employee expresses in writing his or her dissatisfaction with PPA's services / activities/ operations / procedures / regulations provided, Colleagues / Managers / Top Management behavior, any matter brought to their attention and needs to be raised further, any matter that could prejudice or potentially prejudice a client (e.g. cause financial loss, service failure) and may damage PPA's image in the market place.

This stage is appropriate to use when the member of staff considers the behavior adopted intolerable, where the actions undertaken are serious, or where they have been repeated.

The Company will never conduct any retaliation or action against any employee for reporting such concerns.

For the proper classification of an internal written complaint, the incidents fall into the following (indicative) categories:

**19.6.01.** Fraud

**19.6.02.** Internal Policy / Regulation / Procedure Violation

**19.6.03.** Data Privacy Violation

**19.6.04.** Corruption / Bribery

**19.6.05.** Human Rights Issues

**19.6.06.** Issues regarding services provided to clients failure

**19.6.07.** Issues regarding health and safety

**19.6.08.** Issues regarding rational resource management of the company

**19.6.09.** Issues regarding environmental protection and energy saving

**19.6.10.** Other / Please Specify

**19.7.** Mainly due to its organizational independence in the structure of the company and its role to assist the Company's Management in the effective performance of its duties, the Internal Audit Service is appointed as the responsible organizational unit for receiving written complaints. Responsible Organizational Unit for the examination / response of complaints of the Company's employees is the Internal Audit Service. The relevant Departments at which the written complaint is addressed should coordinate with IAS on a timely basis. The response to the complaint by IAS must be objective and justified, written also in a simple and understandable language. The response will be notified to the Internal Audit Service by the relevant Departments within thirty days (30) days of receipt of the relevant complaints. It is clarified that no response to complaints of abusive content, with unclear or unrealistic information, as well as inadequate or untrue contact information is being considered and sent. Should a complain being made involves a member / members of the Board of Directors or Audit Committee, or the Administration Board or, Internal Audit Service must immediately report the complaint to Audit Committee or to Board of Directors respectively, which will forthwith direct the investigations and necessary actions as appropriate.

**19.8.** The Internal Audit Service confirms receipt of any written complaint (to the complainant) within five (5) days by notifying him of the unique reference number of his complaint, as specified below, and informing him that he can use this number in any communication with respect to the specific complaint with the Company.

The Internal Audit Service will notify the complainant of the response of the department responsible each time to which the written complaint is addressed within 45 days of the submission date.

During the investigation, the complainant may be informed of the handling of the complaint. If the response within 45 days is not possible, the Internal Audit Service informs the complainant of the reasons for the delay and indicates the time it deems necessary to complete the investigation and give the answer, which in any case may not be longer than two (2) months from the date of submission of the complaint.

If, following the above procedure, the complainant does not consider the response and the handling of the matter satisfactory; the case will be forwarded to the Administration Board.

In the event of a final decision Administration Board (should be completed within 30 days) which does not satisfy the complainant's request, the Internal Audit Service will inform the complainant in writing with a detailed explanation of the position of the Company and expressly state to him that he has the option to insist on his complaint through other ways, such as indicatively addressing a dispute settlement mechanism, or in the competent courts.

**19.9.** The Internal Audit Service ensures that Internal Complaint Process is available to company's entire staff through appropriate internal communication channels (more specifically, each department will ensure the signing of the hand-written distribution of the form to all its staff). Moreover, complaints form will be available next to each complaint box and sealed complaint boxes will be located at the following locations only:



- ✓ Outside the Internal Audit Service office (Headquarters building)
- ✓ Container Terminal Building (basement level next to the elevator)
- ✓ Ro-Ro Terminal Building (basement level next to the main entrance)

Alternatively, complaints may be submitted via e-mail to [olp-audit@olp.gr](mailto:olp-audit@olp.gr)

Since the Internal Complaint Management Process will operate under confidentiality for all data collected and analysed, it is encouraged that employees also fill out their name and position in the complaint form.

**19.10.** The Internal Audit Service shall ensure that is kept for a maximum of 5 years:

- A record of the documents relating to complaints and any measures taken to deal with the complaint. Documents relating to the complaints submitted will be recorded in the above file, giving them a unique reference number. More specifically, the unique reference number consists of ten digits, of which:
  - The first four digits determine the year, and
  - The next four digits determine the number of each complaint in a serial number.
  - The last two digits determine the number of each complaint category by serial number (as above paragraph 4 hereof).
- Special complaints file, which will summarize the following:
  - The details of the employee, who submitted the complaint,
  - The organizational unit to which the relevant employee belongs,
  - The organizational unit to which the complaint relates,
  - The date of receipt and registration of the complaint,
  - The content of the complaint in summary,
  - The date and, in summary, the content of the written response to the complaint.

Every month the Internal Audit Service provides to the Top Management (Chairman of the BoD, CEO, Deputy CEO's, Assistant CEO, Senior Consultant) information regarding:

- the complaints it receives,
- how these are being handled and
- proposed improvements that need to be implemented.

On an annual basis Internal Audit Service shall provide to the Audit Committee a summary report of the above work.

**19.11.** The Internal Complaint Process is in compliance to the General Data Protection Regulation 2016/679 and Law 4624/2019.

### 20. Compliance with the Code

**20.1.** It is the duty of every staff to fully understand and comply with the Code. Managers should also ensure that their subordinates understand well and comply with the standards and requirements stated in the Code.

**20.2.** Anyone who is in breach of the Code commits disciplinary offence and is subject to the disciplinary sanctions of Article 17 of the General Staff Regulation. As far as the in-house lawyers of the Company are concerned, the Law 4194/2013 (“Code of Lawyers”) is applicable, as in force from time to time. In cases of indication of criminal offences, a report or lawsuit will be filed to the competent authorities.

**20.3.** Channels of complaint are open. Any enquiries of staff members about the Code or complaints on possible breaches of this Code should be channeled to the Internal Audit Service for advice and action. The Company will consider all complaints impartially and efficiently. All information received will be kept confidential.

### 21. Reporting Violations of the Code

**21.1.** If we identify violations of the present Code, internal regulations or policies, we must report it, eponymously (via email at [olp-audit@olp.gr](mailto:olp-audit@olp.gr)) or anonymously to the Internal Audit Service (via the Internal Complaint Boxes). We must also report any incident that could be life-threatening, or may present a threat to safety, to the environment or to the Company’s assets. We encourage the submission of eponymous reports since they are more easily investigated.

**21.2.** In any case, we can obtain clarifications or guidance on any issues that relate to the Code of Conduct, as well as any ethics and compliance-related issues from the Internal Audit Service (via email at [olp-audit@olp.gr](mailto:olp-audit@olp.gr))

### 22. Modification, Interpretation, Supervision and Effectiveness of the Code

**22.1.** This Code constitutes the guideline document of the occupational ethics of staff members. The occupational behaviors of staff members are also governed by applicable policies, laws, regulations, Articles of Incorporation and applicable rules of the Company.

**22.2.** This Code shall be interpreted by the Top Management of the Company. Any termination or modification of the Code shall be subject to the approval of the Top Management of the Company in the form of resolutions pursuant to the Articles of Incorporation and the most updated version of the Code will always be posted on the Company’s website.

**22.3.** This Code shall take effect upon its approval by the Administration Board of the Company and its uploading on the Company’s website.