

POLICY – Code of Conduct

1.1.1 Introduction

The Code of Business Conduct sets out the ethical standards and expectations for all Infitum employees and partners. It is designed to ensure that we conduct business in a legal, ethical, and responsible manner. Adherence to this Code is mandatory to maintain our reputation and operational integrity.

Scope: Applies to all employees, whether full-time, part-time, temporary, or contracted, at all levels and locations of Infitum, including consultants, contractors, agents, and other business partners.

1.1.2 Our core values

- **Ethics and integrity:** We are committed to conducting our operations in accordance with the highest standards of ethics and integrity. We expect every employee and business partner to adhere to these principles in every aspect of their company-related behavior.
- **Respect and Fairness:** We treat everyone with respect and dignity, and we expect the same in return. We strive to create a workplace where everyone feels valued and respected.
- **Accountability and Transparency:** We take responsibility for our actions and results. We encourage open communication and critical feedback to foster transparency and trust.
- **Innovation and Excellence:** We pursue innovation by constantly seeking methods to improve our services and products. We strive for excellence in every aspect of our business.

1.1.3 Professional conduct

- **Compliance with Laws:** Employees must understand and comply with all laws, rules, and regulations that apply to their work, including international trade laws and regulations.
- **Conflicts of Interest:** Employees must avoid any situation that may conflict with Infitum's interests. This includes not using personal influence to secure advantages intended for personal gain. Any potential conflicts must be disclosed to management as soon as they are identified.
- **Communication:** All communications, internal and external, must be clear, honest, and accurate. Falsifying or omitting important information is strictly prohibited.
- **Privacy and Confidentiality:** We are committed to protecting the data of our customers, employees, and partners. Employees must comply with our Data Protection Policy, which outlines our practices to ensure data security and comply with relevant laws.

1.1.4 Work environment

- **Diversity and Inclusion:** We are committed to promoting diversity in our workforce and ensuring an inclusive and discriminatory work environment.
- **Harassment:** We do not tolerate harassment in any form. All allegations of harassment are taken seriously and investigated promptly.
- **Health and Safety:** We are dedicated to maintaining a safe work environment. We comply with all applicable health and safety regulations and encourage employees to report potential hazards.

1.1.5 Business practices

- **Fair Conduct:** We engage in fair and open competition by adhering to ethical standards and laws governing fair trade. We avoid deceptive practices.
- **Anti-bribery and corruption:** Infitum supports our zero-tolerance policy against bribery and corruption. Employees and related parties are prohibited from offering, giving, asking for or receiving any form of bribery. More details are available in our comprehensive anti-bribery and anti-corruption policy.
- **Gifting and Hospitality:** Accepting and offering gifts should be sparing and can only happen when they do not influence business decisions, ensuring that they are not misinterpreted as bribes.
- **Supplier Relationships:** We work with suppliers through a transparent and ethical procurement process. Suppliers are selected based on quality, performance, and price, among other ethical criteria. We expect our suppliers to adhere to our ethical standards and business practices.

1.1.6 Corporate Governance

- **Ethical Leadership:** Leaders at Infitum are role models. They adhere to these standards and foster a culture of transparency and integrity.
- **Responsibility to Stakeholders:** We ensure that our business decisions take into account our responsibilities to stakeholders, including shareholders, employees, customers, and the communities in which we operate.

1.1.7 Protection of the Company's Assets

- Employees are responsible for the proper use and protection of the company's assets. These assets, both physical and spiritual, must be used for legitimate business purposes and must be protected from theft, damage, and misuse.

1.1.8 Reporting and compliance

- **Whistleblower Protection:** We provide secure channels for employees to report unethical behavior without fear of retaliation. More details are available in our comprehensive Disclosure Policy.
- **Monitoring and Enforcement:** Infitum conducts regular audits and compliance audits to ensure adherence to this Code of Conduct. Employees are encouraged to report any suspected violations or unethical behavior through our reporting channels, ensuring protection against retaliation.
- **Recognition of the Code of Conduct:** All employees and affiliated third parties are required to acknowledge that they have read, understood, and agreed to abide by the Code of Conduct. This recognition is a testament to their commitment to upholding our ethical standards and practices.

1.1.9 Implementation and supervision

- **Training and Communication:** All new recruits receive training on this Code, and ongoing training sessions are held to refresh employees' knowledge and resolve any doubts.
- **Review and Updates:** This code is periodically reviewed to address new challenges and ensure it remains up-to-date and effective.

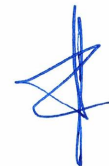
1.1.10 Disciplinary measures

- Failure to comply with this Code may result in disciplinary action, including termination of employment. Actions will be fair but rigorous at all levels of the company, to maintain the integrity of our operating standards.

1.1.11 Record-keeping

- We keep accurate and complete records of our operations and transactions. This accountability ensures our compliance with financial and regulatory requirements.

For and on behalf of INFINITUM S.A.



Antonia Kariotoglou
President and Managing Director