



Code of Ethics and Business Conduct

Date: June 2019

Version: v1



Introduction

This Code of Ethics & Business Conduct sets the principles governing all policies and regulations of Performance Technologies (PT). The purpose of the corporate policies is to specify and formulate PT way of conducting business in accordance with its values, the applicable laws and regulations as well as industry standards. This Code of Ethics & Business Conduct provides guidance on what is expected from every single person working for and/or cooperating with PT, while it specifies and contributes to the effective and continuous implementation of PT business principles by establishing certain minimum standards of behaviour in key areas.

This Code applies to everyone working for the Company regardless of location, role or level of seniority. This includes all Employees, Managers and Directors of the Company. PT expects from temporary and contract employees, consultants, agents and any other third party who acts in the Company's name to act in accordance with the principles of the Code.

Every subsidiary and joint venture, which the Company controls, must adopt and comply with this Code. Where PT participates in but does not control a joint venture relationship, it will encourage and -in some cases- require its partners to meet the requirements of this Code.

Integrity, transparency and responsibility characterize the way we conduct business. Operating with a strong sense of integrity is critical to maintaining trust and credibility with our customers, partners, employees, shareholders and other stakeholders. Such trust and credibility requires transparency in how we conduct business and confidentiality when we conduct business to protect our clients' business assets and data.



POLICIES

Ethics & Compliance Policies

Anti-corruption / Anti-bribery policy

PT does not tolerate corrupt behaviour or bribery of any kind and under any circumstances. PT has adopted the anti-corruption and anti-bribery policy, to ensure that its employees or anyone acting on behalf of PT refrains from offering bribes or otherwise attempts to improperly influence a decision-maker in order to obtain business or business advantage. Moreover, all employees and others acting on behalf of PT are not allowed to engage in activities that constitute a bribe or could be perceived to constitute a bribe or even create the impression of impropriety.

- Travel & Accommodation

PT shall not pay or reimburse any expenses for the travel and accommodation of third parties (e.g. customers, suppliers, or other business partners), unless the expenses are related to a legitimate business purpose and prior written approval has been obtained. In any case, travel and accommodation costs should be modest and reasonable. Such expenses should be paid directly to the third-party provider and not the traveller.

- Gifts, Meals & Entertainment

Gifts offered to third parties (such as customers, distributors, vendors, service providers, government officials or other professionals) must be appropriate and moderate under the circumstances and must not create the impression of improper influence, illegitimate advantage or imply any obligation for PT. Gifts should normally be offered only on customary business and cultural occasions and shall never include cash or cash equivalents.

- Sponsorships

PT may offer scholarships, grants, charitable contributions or non-commercial sponsorships to support the advancement of knowledge in science, or to support



other socially beneficial purposes. Any sponsorship must receive the appropriate written approval by the manager. Any sponsorship, grant or charitable contribution should not intend to influence anyone or obtain an improper advantage neither create the impression of a bribe or other corrupt practice.

- Contributions to political parties

PT has adopted a general policy prohibiting any activities related to authorizing or making contributions to political parties or candidates in the Company's name. Any deviations from this general policy must obtain written approval from the Company's Board of Directors.

Whistleblowing Policy

PT encourages all employees or/and third persons to promptly nominally or on a no name basis report any breach or suspected breach of any law, regulation, the PT Code of Ethics & Business Conduct or other company policies and procedures, as well as any other alleged irregularities that could possibly occur in the course of its operation and which could harm the company's reputation, or any attempts to conceal same (e.g. theft, money laundering, corruption, fraud, abuses, irregularities related to its financial statements, discriminations, sexual harassment and assaults and any misconduct etc.).

PT manages whistleblowing reports and provided information promptly and with strict confidentiality and will not undertake negative (punitive) actions against employees for completing a report. The protection of the anonymity of the whistleblower is an important principle of the Whistleblowing Policy, unless the report is malicious or the disclosure of the whistle blower's identity is imposed by law.

Furthermore, if the report refers to individuals it should not contain elements, which are sensitive personal data (i.e. data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, health, social welfare and sexual life, criminal prosecutions or convictions).

There are particular *whistleblowing channels*, which the employees or/and any third persons should utilize in order to report any breach or other alleged irregularities:



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- Via e-mail: info@performance.gr
 - Via telephone: 0030 2109947100

Human Resources Policies

Diversity & Equal Employment Policy

As a corporate responsible company, PT values and promotes the workforce diversity as a key business priority. PT is committed to developing and ensuring a harassment-free work environment, where business activities such as hiring, promotion, development and compensation of employees, are conducted without regard to race, colour, religion, gender, gender identity or expression, sexual orientation, national origin, disability, or age.

These business activities as well as the design and administration of PT benefit plans comply with all applicable laws, including those dealing with equal opportunity. All employment decisions at PT are based on business needs, job requirements and individual qualifications, without regard to such characteristics. PT does not tolerate discrimination or harassment of any kind.

PT requires its business partners and suppliers to respect workforce diversity and equal employment affairs as well as adopt similar policies.

Human Rights & Labour Policy

This Human Rights and Labor Policy sets the principles and standards to ensure that all employees are treated with respect and dignity, they are working under their own free will, and they are properly compensated for their effort and contribution to the company's goals.

Towards this direction, PT:



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- ✓ Does not allow child labor under any circumstances. All employees must meet the minimum age requirement set by Greek laws.¹
 - ✓ Condemns fraud, deception, or coercion in the recruitment, placement or management of persons.
 - ✓ Complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Working hours shall be limited to what is acceptable by local laws.
 - ✓ Values and respects workforce diversity.
 - ✓ Provides a safe and healthy workplace complying with health and safety laws, regulations and internal practices.
 - ✓ Maintains a workplace that is free from violence, harassment and other unsafe or disruptive conditions.
 - ✓ Respects its employees' right to join, form or not to join a labor union without fear of punitive actions.
 - ✓ Cultivates and promotes a culture of respect for human rights and promotes awareness-raising in this field among its employees.
 - ✓ Requires its business partners and suppliers to respect human rights and adopt similar policies.

Employee Development & Benefits Policy

Employee Development & Benefits Policy, including performance management, talent management, learning & development, reward & benefits management formulates our proactive and focused approach of managing our people.

PT is committed to:

- ✓ Best fit and induct new employees to PT vision, values, culture and workplace in general.

¹ According to the current Greek legislation - art. 50 seq. of law 3850/2010, as in force - minors under the age of 15 are not allowed to work. Minors under the age of 18 are allowed to work under specific prerequisites, namely following a completion of a program of professional guidance which is coordinated and offered by the public authorities, in particular the Organisation of Employment of Human Resources, which provides courses for specific expertise, none of which is included in the jobs and positions that are provided in the Organizational Scheme of our company.



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- ✓ Foster continuous employee development, by promoting and encouraging employee participation in internal or external training programs that cover their current professional needs.
 - ✓ Perform periodic evaluations of the employees' performance as well as communicate the results.
 - ✓ Recognize and reward the performance and dedication of all of its employees

Occupational Health & Safety Policy

PT strives to adopt labour and employment practices and to maintain a healthy, safe and productive work environment.

Towards these directions, PT:

- ✓ Provides an environment where work-related health and safety risks are controlled to prevent injuries, accidents and occupational illnesses.
- ✓ Complies with national legislation and all directives related to Health and Safety at work.
- ✓ Aims at continuous improvement of its occupational health and safety performance.
- ✓ Organizes and conducts occupational health and safety training programs for all of its employees.
- ✓ Ensures that all employees understand, implement and comply with the occupational health and safety policy and practices.
- ✓ Intends to influence its business partners and third parties to adopt and implement similar policies and practices.
- ✓ Sets, measures and monitors annual occupational health and safety goals and objectives for all of its business operations.
- ✓ Requires its business partners and suppliers to provide a safe and healthy work environment for its employees and adopt similar policies.



Corporate Social Responsibility Policies

Environmental Policy

PT is committed to conducting all its business activities responsibly with due regard to environmental impact and sustainable performance. The Company has developed, promotes and consistently implements corporate policies aiming at providing a safe and healthy workplace, protecting the environment and conserving energy resources.

To reach these targets, PT:

- ✓ Conducts its business activities in full compliance with applicable environmental laws and regulations.
- ✓ Periodically monitors and measures progress of the Company's environmental performance and continually strives to improve its environmental footprint.
- ✓ Delivers environmentally responsible services to its customers.
- ✓ Fosters a culture of environmental responsibility and employee engagement.
- ✓ Prevents waste and pollution by reusing and recycling materials and using recyclable packaging and other materials.
- ✓ Implements ways to optimize consumption of fuels and minimize emissions.
- ✓ Ensures the responsible consumption of energy throughout all of its business activities and operations, including conserving energy, improving energy efficiency, and giving preference to renewable energy sources when feasible.
- ✓ Participates in efforts to improve environmental protection.
- ✓ Encourages and -in some cases- expects from its customers and other stakeholders to consider the environmental impact of their business activities.



Quality Policy

PT is committed to continuously improving the quality of its services with the aim of maintaining and enhancing customers' satisfaction, reliability and trust as well as contributing to the Company's sustainability.

To achieve these goals, PT has established, promotes and consistently implements the following basic principles and guidelines:

- ✓ Maintains ISO 9001:2015 certified quality management system which establishes quality responsibilities, targets, monitoring methods and the review of business performance.
- ✓ Validates the effectiveness of quality management system through internal and external audit processes.
- ✓ Sets annual measurable quality objectives for all operations to ensure continuous improvement and compliance with all standards.
- ✓ Ensures the wide communication of the Company's quality responsibilities and targets across all levels of the organization.
- ✓ Provides information, tools, instructions and training for employees on quality issues.
- ✓ Fosters the involvement and engages the commitment of the employees across the Company's quality values and principles at all levels of the organization.
- ✓ Focuses on sustainable improvements and offers its customers high-quality integrated solutions and services.
- ✓ Communicates quality aspects to associates, customers and principal stakeholders that have an impact on, or are affected by the Company's quality management system.
- ✓ Cooperates with business partners and suppliers, who act responsibly and embrace the same quality commitments and responsibilities.

Competition

We are dedicated to ethical, fair and vigorous competition. PT is prepared to compete successfully and in full compliance with all applicable antitrust, competition and fair



dealing laws. All employees have a responsibility to ensure that they are familiar with applicable competition laws.

Confidential Information

We value and protect our confidential information and we respect the confidential information of others. It includes trade secrets, business, marketing and service plans, customer insights, engineering ideas, designs, databases, records, salary information and any non-published financial or other data. Employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information. In case that third parties, such as joint venture partners, suppliers or customers share with PT confidential information, such information shall be treated with the same care as if it was PT' s confidential information.