

## **Code of Conduct and Ethics**

Our employee code of ethics and business conduct outlines our expectations regarding the behavior of our employees towards other members, customers, stakeholders, and society.

Our company stands for the core values of synergy, honesty, and integrity. As such, we expect all organization members to be directed by the same values in their judgment and behavior.

Open communication and expression should be guided by the desire for a respectful, safe, and collaborative working environment.

### **Scope**

This policy applies to all organizational members regardless of rank or employment type.

### **Compliance with law**

Employees must work to protect the company and its legal interests by complying with all environmental, trading, safety, and privacy laws.

### **Antitrust and Competition Laws**

Q&R is committed to observing the applicable antitrust or competition laws. They seek to protect the competitive process so that consumers receive the benefits of competition. Violations of antitrust or competition laws may result in severe penalties, including large fines and jail terms.

Compliance with these laws is required at all times. You must not:

- ✓ fix or control prices, either by agreeing directly with a competitor, or any other method, such as through third-parties;
- ✓ structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging), including abstaining from bids or submitting non competitive or "courtesy" bids;
- ✓ boycott suppliers or customers;
- ✓ divide or allocate markets or customers; or
- ✓ limit the production or sale of products or product lines.

These prohibited agreements are against Company's policy and should be equally avoided in your discussions with partners, as well as representatives of other companies. In addition, you must refrain from prohibited discussions with competitors about prices, costs, profits or profit margins, production volumes, or bids or quotes for a specific customer's business.

Certain sales tactics or other arrangements with customers or suppliers may also raise antitrust and competition law risks, if they unfairly restrain or prevent competition by your competitors or among your customers.

Examples of sales arrangements that have been found to violate the antitrust laws include predatory pricing below cost, exclusive dealing contracts, bundled or tie-in sales, agreements with customers or suppliers about minimum resale prices, and discriminating between competing customers.

## **Improper Payments, Money Laundering, and Economic Boycotts**

You are prohibited from offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks, or payments of money or anything of value (directly or indirectly) to improperly obtain business or any other advantage for Company or yourself.

Penalties for violating these laws are severe and can include prison time and large fine for individuals. Q&R also prohibits all forms of money laundering, which involves disguising, channeling unlawfully obtained money, or transforming such money into legitimate funds.

The above prohibition applies to:

- ☞ Government and public sector, which includes public utilities, higher education, public healthcare entities, and public international organizations and their employees or officials
- ☞ Political parties or candidates for political official
- ☞ Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or official
- ☞ Privately-held commercial companies and their employees
- ☞ Any other third party

Q&R prohibits giving money or anything of value directly or indirectly to a government official or employee of a state-owned enterprise, or to the spouse, significant other, child, or other relative of any such person, for the purpose of influencing or rewarding an action or decision of the government or public sector employee or official or to gain any improper advantage for Q&R.

“Anything of value” is intended to be broad and covers not only money, but also gifts, lavish or excessive entertainment, funding of personal travel such as sightseeing, contributions to charity, and employment opportunities.

Q&R also prohibits facilitation or facilitating payments, which are payments to an official to speed up or expedite routine government actions, including processing and approving applications and permits.

## **Dealing with Government**

Q&R’s standards and the applicable laws for dealing with government and public sector employees or officials are more stringent than standards for commercial company employees.

You must strictly observe the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Activities that may be appropriate when dealing with nongovernment customers may be improper and even illegal when dealing with government. If you deal with any governmental entity, including public international organizations, you are responsible for knowing and complying with all rules that apply to government contracting and interactions with government officials and employees, including but not limited to the following requirements:

- ☞ You must not give or offer, either directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of monetary value to any government or public sector

employee or official except as may be permitted by applicable law. You are required to establish and maintain appropriate internal controls to ensure compliance with all applicable laws concerning prohibitions on offering anything of value to government and public sector employees or officials.

- ☞ You must not provide, attempt to provide, offer, or solicit a kickback, directly or indirectly, to obtain or reward favorable treatment in connection with any transaction.

### **Lobbying of Government Officials**

Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, however, the legal definition of “lobbying” can also cover procurement and business development activity.

You are responsible for understanding when your activities may legally be considered lobbying in a particular jurisdiction and for complying with all applicable laws.

You may not lobby government on behalf of Q&R.

### **Trade Compliance Laws and Regulations**

Greek trade laws and regulations govern all imports, exports, re-exports, and use of Greek or EU origin commodities and technical data, wherever located.

Q&R requires that you comply fully with all applicable trade laws and regulations. Failure to comply could result in the loss or restriction of your or Q&R’s trade privileges. Violation of these trade laws and regulations may also result in fines and imprisonment. You are responsible for understanding how the trade laws and regulations apply and for conforming to these laws to ensure no technology, data, information, program, and/or materials resulting from services (or direct product thereof) will be imported or exported, directly or indirectly, in violation of these laws and regulations, or will be used for any purpose prohibited by these laws and regulations.

### **Safety in the working environment**

All employees should respect their colleagues, supervisors, and customers. Any discriminatory behavior or harassment will not be tolerated.

### **Professionalism**

Employees must show integrity and professionalism in every aspect of conduct, including matters involving absenteeism, tardiness, and dress code compliance. Personal appearance should project the company’s commitment to professionalism.

### **Integrity**

All employees should fulfill their work with integrity and respect toward our stakeholders. Members are discouraged from accepting gifts from clients, or partners for the benefit of another party. We are all expected to avoid any personal, financial or other interests that may interfere with the quality of work.

### **Care for the Physical Environment**

Employees should treat company property and their physical environment with respect and care.

### **Disciplinary Actions**

Employees who repeatedly or deliberately fail to follow our code of conduct will meet an appropriate disciplinary action.

Following a clear warning, employees who persistently show indecorous behavior may face demotion, reprimand, detraction of benefits, suspension, or termination.

Legal actions may be taken in cases of theft, embezzlement, corruption, and other unlawful actions.