

52° χλμ. Εθνικής οδού Αθηνών - Λαμίας, ΒΙ. ΠΑ. Αυλώνα Αττικής, Τ.Κ. 19011, Τηλ.: +30 22950 42815 -6 -7, Fax: +30 22950 42810, Κινητά: 6978.184050, 6978.184051, 6978.184052

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CODE OF ETHICS AND REGULATIONS FOR WORKING AT THE COMPANY GEORGIOU FLEXIBLE PACKAGING S.A.

Introduction

Since 1969, the company GEORGIOU FLEXIBLE PACKAGING S.A. produces plastic and flexible packaging for various sectors, such as retail, foodstuffs, industry, beverages, personal care.

This text is the Code of Ethics of GEORGIOU FLEXIBLE PACKAGING S.A. and is the way for the company's principles to be communicated and clarified.

The Code is made known to:

- all our personnel of the company GEORGIOU FLEXIBLE PACKAGING S.A. and
- all interested parties

through the company's website (www.flexia.gr)

Any observations or complaints about everything included in the present Code can be made by e-mail to customerservice@flexia.gr

Main Principles

The main principles of the code of ethics that the company GEORGIOU FLEXIBLE PACKAGING S.A. follows are the following:

1st Principle. FREE CHOICE TO WORK AT THE COMPANY

- 1.1 Work at the company GEORGIOU FLEXIBLE PACKAGING S.A. cannot be involuntary, compulsory, or forcible and be required without the worker's consent.
- 1.2 Workers are not forced to pay guarantees, to submit identity cards or other necessary documents of theirs that their employer keeps; therefore, they are free to resign from their work whenever they wish and after having given reasonable advance notice.

2nd Principle. FREEDOM OF ORGANIZATION/REPRESENTATION OF THE WORKERS

- 2.1 Workers, without exceptions, have the right to participate in or found labour unions of their choice and engage in collective bargaining.
- 2.2 No discrimination is applied against workers' representatives and they are provided with the possibility of performing their respective duties at the workplace.

3rd Principle. WORKING UNDER HEALTHY AND SAFE CONDITIONS

3.1 At GEORGIOU FLEXIBLE PACKAGING S.A., a working environment where the rules of Health and Safety are followed is provided, as defined by the existing knowledge of industrial activity and probable specific risks. Sufficient measures are adopted to prevent accidents and injuries from taking place during work, by minimizing (to the greatest possible extent and based on common sense) the inherent risks of the working environment



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- 3.2 Workers are trained regularly on health and safety issues and their training is registered. This training is repeated for new workers and everyone that changes their duties.
- 3.3 Workers are provided with access to clean restrooms and drinking water and if necessary, clean food storage areas as well.
- 3.4 GEORGIOU FLEXIBLE PACKAGING S.A. ensures that workers are not subject to any form of harassment or violence (physical, sexual, psychological, verbal, etc.) during their work.
- 3.5 Workers assume a commitment not to consume alcohol during their work and not to smoke wherever this is not allowed (posted signs). The presence of flammable material in the production process does not allow any flexibility concerning the issue of smoking.

4. Principle. TOTAL REJECTION OF CHILD LABOUR

- 4.1 GEORGIOU FLEXIBLE PACKAGING S.A. does not employ children.
 - 4.2 The company GEORGIOU FLEXIBLE PACKAGING S.A. is willing to participate in programs aiming to free any child found working from work, so that he or she may continue to receive a high-quality education until his or her maturity. A "child" is defined as any person less than 15 years old or prior to reaching the age at which required education ends.
- 4.3 Children and young people below 18 years old are not hired by our company.

5th Principle. SALARIES AND WORKING HOURS

- 5.1 The salaries and allowances or benefits received by the workers at the company GEORGIOU FLEXIBLE PACKAGING S.A. cover at least the levels established by law.
- 5.2 All workers at GEORGIOU FLEXIBLE PACKAGING S.A. are provided with information about the conditions of their hiring and in reference to their regular salary or daily wages. The same thing is done every time that they are paid, with information provided about possible additional compensation applicable to each payment period.
- 5.3 Pay cuts or deductions not established by law are not allowed.
- 5.4 The working hours of the workers, except for overtime, are in accordance with national labour legislation and individual contracts.
- 5.5 Any overtime should be used responsibly, by taking into consideration the following: their frequency, each worker's working hours. and the working hours for the personnel as a whole. Any overtime is not used to replace regular employment and is always paid at a higher rate than regular work.



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6th Principle. REJECTION OF DISCRIMINATION AND HARASSEMENT

- 6.1 At the company GEORGIOU FLEXIBLE PACKAGING S.A., no distinctions are made regarding hiring, payments, access to training, promotions, firing, or pension payments regarding race, social status, nationality, religion, age, any disability, sex, civil status, sexual orientation, participation in trade unions, or political convictions.
- 6.2 Abuse or disciplinary measures involving violence or the threat to use them, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.
- 6.3 The company encourages internal communication and the effective provision of information to all workers. For this purpose, announcements are posted on the notice board and informational meetings are organized.
- 6.4 For the personnel of the company, it is possible to express any complaints, proposals for improvement or denunciation (anonymously or by name) through submission boxes in areas of common use at our facilities. All complaints, proposals, and denunciations are handled directly and confidentially by the management.

7th Principle. TRANSPARENCY IN ALL ITS PARTNERSHIPS WITH CLIENTS/SUPPLIERS/INSPECTING ENTITIES

- 7.1 GEORGIOU FLEXIBLE PACKAGING S.A. pursues stable cooperation with trustworthy suppliers, based on mutual trust and following the basic principles described in the present code.
- 7.2 Evaluations of suppliers' offers are based on objective criteria. Providing or receiving any illegal commissions, bribes or similar payments of any type is prohibited. In those cases, the supplier must inform GEORGIOU FLEXIBLE PACKAGING S.A.
- 7.3 GEORGIOU FLEXIBLE PACKAGING S.A. Is opposed to any form of bribery for commercial or financial benefit. The company's workers do not offer or receive any present or payment that constitutes or may be interpreted as a bribe. In such cases, the workers must inform the Management immediately.
- 7.4 GEORGIOU FLEXIBLE PACKAGING S.A. is particularly sensitive to issues of personal data protection. All processing of personal data carried out by the company is governed by the principles of legality, objectivity, and transparency, as well as the confidentiality of data and the limitation of their storage period, according to the provisions of currently valid legislation, including the General Data Protection Regulation (GDPR).
- 7.5 GEORGIOU FLEXIBLE PACKAGING AE S.A. accepts any inspection by state authorities and provides free access to its records and its facilities
- 7.6 Our company does not apply practices that lead to monopolies or oligopolies.

8thPrinciple. TRUST-CONFIDENTIALITY

The company's personnel assume a commitment in the exercise of its duties and in all its transactions with third parties not to make known or available in any way any information belonging to the company GEORGIOU FLEXIBLE PACKAGING S.A. that is confidential or secret (including information about its clients, partners, etc.) according to the provisions of currently valid legislation, including the General Data Protection Regulation (GDPR).



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8.1 Confidential or secret is information that has not been made known or is not available to the general public (indicatively, financial data, technical data, invoicing information, lists of clients and suppliers, contracts, personal data, plans for mergers and acquisitions, strategic goals, information related to the company's evolution, etc.).

8.2 It is an obligation for the personnel of GEORGIOU FLEXIBLE PACKAGING S.A. to safeguard confidential and secret information, regardless of the way that it came into their possession and knowledge and do not to make it known to persons outside the company, including members of their family and friends. The above obligation continues for the entire duration of the working relationship and after its dissolution for any reason. Furthermore, the personnel should maintain absolute confidentiality regarding issues designated as confidential or secret by the established legislation. Information of a confidential or secret nature can be information related to intellectual property rights or patents belonging to FLEXIA- GEORGIOU FLEXIBLE PACKAGING S.A.

Compliance with and Faithful Adherence to this Code

It is the responsibility of all the workers of the company'GEORGIOU FLEXIBLE PACKAGING AE S.A. to read and understand the Code, to request guidance whenever this is required, and to comply with its spirit and contents.

The present Code is binding for everyone that works at the Company, regardless of the time of their hiring and the type of their contract or its duration, in accordance with their duties and responsibilities, and regardless of their position in the hierarchy.

The company's workers should not engage in behavior that could damage its reputation. They are required to safeguard confidential information and protect the company's assets. Workers who enter into transactions with suppliers and clients in the context of their work should mention the Code for their consideration and recommend their compliance with its content if this is required. All workers are required to mention any infringements or potential infringements of the Code to the head of their department and/or to the management.

Violation of the Code

The handling of violations of the Code is assigned to the management of the Company GEORGIOU FLEXIBLE PACKAGING S.A., which according to the seriousness of the infringement, has the right to proceed to disciplinary actions according to currently valid legislation, labour regulations and internal procedures.

Validity of the Code

The Code of Ethics is approved by the management of the company, which is responsible for ensuring that the principles included in the Code are made known, understood, and followed by all employees. Compliance with the Code is monitored regularly. The relevant observations that ensure its correct application, as well as further revision, are the responsibility of the management. Any amendments or revocations will be made known accordingly and the currently valid Code will be posted on the Company's website (www.flexia.gr). The validity of the present Code begins immediately after its publication on the company's website.



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APPENDIX

1. QUALITY ASSURANCE POLICY

The vision of GEORGIOU FLEXIBLE PACKAGING S.A. is to become a company with a leading position on the European market in the sector of flexible packaging.

The quality assurance policy of GEORGIOU FLEXIBLE PACKAGING S.A. consists first of all of satisfying its clients, and the complete satisfaction of their needs through reliable products of exceptional quality.

For this purpose, GEORGIOU FLEXIBLE PACKAGING S.A. cooperates with leading companies in Greece and abroad, inspecting the raw materials received, while it simultaneously applies ISO 9001:2015, ISO 14001:2015 and ISO 22000, BRC quality systems, completely harmonized with its needs and goals.

The company is a member of the SEDEX organization, which provides a tool (SMETA) for the evaluation, recording, and promotion of all the practices applied at a company that on a documented basis, support social responsibility and ethical behavior within the supply chain.

GEORGIOU FLEXIBLE PACKAGING S.A. has been certified by EUROCERT and participates in the "E $\Lambda\Lambda$ A- Δ IKA MA Σ " (Essentially Greek) Initiative, complying with the quantitative and qualitative criteria required. "E $\Lambda\Lambda$ A- Δ IKA MA Σ " is an initiative by companies whose headquarters, production facilities, and ownership are all located in Greece and aims to promote cooperation among purely Greek companies that share common concerns and objectives.

All of us, the Management and the workers of the company are committed to the following goals because we believe in continuous improvement:

- 1. faithful application and continuous improvement of quality assurance under ISO 9001:2015, ISO 14001:2015 and ISO 22000, BRC
- continuous training of the personnel, in order to ensure a high level of technical knowledge in order for everyone to know about all quality issues
- 3. continuous modernization and utilization of the possibilities provided by technology for the more efficient and effective performance of their work
- 4. respect for and application of Greek and European legislation regarding the products produced, as well as the environment.
- 5. reduction to a minimum of non-compliant products during production
- 6. continuous improvement of customer satisfaction
- 7. continuous innovation regarding the development of new products.



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We believe that all of these things lead not only to the best possible image of our company on the market, but also to a feeling of pride and satisfaction for all of us, the management and workers who are working for the growth of GEORGIOU FLEXIBLE PACKAGING S.A.

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