



THESSALONIKI PORT AUTHORITY SA

Code of Ethics

From its incorporation to the present, THPA SA has always placed special emphasis on the principles of integrity and transparency, which have guided its business activities. The Code of Ethics states to each one of us that the way in which our business results are achieved, is equally important with the results themselves.

The company's Code of Ethics includes the fundamental principles, rules and values that shape the framework of corporate activities and determine our daily conduct and practice. The sum of these rules and principles describes the type of behavior that we expect from our people, as well as the way in which we conduct our business activities with our customers, our suppliers and all our associates.

Scope

The Code of Ethics and the related procedures and measures apply to all workers, employees, executives, and Senior Management. We also encourage our contractors, suppliers, associates, consultants, users and other business partners to respect the principles of this Code.

Our Principles

Integrity

We respect the country's laws and its regulatory framework, as well as international corporate responsibility commitments and initiatives, and we act with a strong sense of responsibility and professional integrity. We recognize our obligation to operate with integrity and transparency and to support our local community where we carry out our activities. We invest and actively participate in improving quality of life for everyone, inside and outside the company. THPA SA is neither involved in nor does it permit any behavior or transaction that could damage its integrity and reliability.

Technological Leadership and Innovation

At THPA SA we have technical knowhow and we use it to the company's distinction. We work methodically and earnestly, in keeping with company regulations. We focus on technological specialization towards the continuous achievement of high-quality results

and added-value solutions. We develop an environment of continued learning and we invest in technologies, in contemporary equipment and knowhow, in order to promote innovative ideas, constantly seeking the improvement of our processes and systems.

Team Spirit

The success of the work of THPA SA is founded on our mutual will to operate as a team that provides the best possible services in the transport sector. We feel proud to be working in teams and collaborating, supporting each other to achieve our common goals, either as team members or as team leaders. We choose to work in teams, utilizing everyone's skills, ideas, and opinions in the best possible way.

Merit-based Approach

We work in a spirit of fairness and transparency. All our employees must carry out fair transactions with our customers, suppliers, and competitors; we must base our actions on merit and always on the rules of fair competition. We note people's personalities and abilities and we place them in the positions where they will contribute to the greatest degree and where they will be recognized based on their abilities. We always think, act and communicate consistently and with integrity.

Gifts, Invitations and Other Donations

In regards to any eventual gifts, donations, tips, or offers in the form of gifts, we use strict processes to ensure that there is no possibility of malicious intent or improper conduct. The acceptance of gifts and donations that may challenge our integrity or may appear to influence our professional decisions is strictly prohibited.

Compliance

We comply with current provisions of Greek and European legislation, as well as with all provided standards and principles. All our workers, employees, managers and all other persons who act on behalf of THPA SA are expected to comply with the current legislative framework and all rules and to observe any imposed restrictions. All employees are personally responsible for observing the law and the Rules of Procedure of THPA SA. In the event of a conflict between the law and the principles included in this Code, the law shall prevail.

Non-Discrimination

With the term discrimination, we refer to any direct or indirect action that pertains to education, employment, promotion, professional occupation and which deprives an individual of the possibility of equal treatment.

THPA SA hires, evaluates, and administers in such a way as to avoid any discrimination based on race, gender, religious beliefs, age, disability, sexual orientation, nationality, political beliefs, union membership, and social or ethnic origin. THPA SA is committed to facilitating the professional integration of persons who belong to vulnerable social groups, such as youths and persons with disabilities.

Harassment

At THPA SA, the dignity of and respect for all employees and executives is a fundamental principle. Any act or behavior of harassment or bullying is not tolerated. Furthermore, the company promotes a suitable environment, free of any form or act of sexual harassment.

Reporting Violations

All employees have the right to report to their superiors any cases where it appears that the contents of this Code of Professional Ethics are being violated. Managers and members of the Board of Directors must report any Code violations directly to the Audit Committee. Such reports may also be made anonymously, pursuant to current policies and procedures. The Audit Committee receives all reports related to violations of this Code. Persons who report violations in good faith shall not be subject to any kind of retribution. Reports will be investigated and, where necessary, corrective and suppressive actions will be undertaken.

Monitoring and Amendments to the Code

The Code is a document of fundamental importance for THPA SA. The implementation of its principles is mandatory for all of us, because it defends the interests of Management, Staff, Shareholders, and the community. Furthermore, it contributes to the smooth operation of THPA SA and ensures the company's credibility and goodwill.

Every business unit is responsible for its compliance with the provisions of the Code of Professional Ethics, and of all other internal regulations in its area of responsibility. Certainly, the Code cannot foresee every special instance that may occur. In such cases, we must all act in the spirit of the Code, in combination with our personal judgment and the moral standards observed by honest persons.

Internal audit has the unrestricted right to collect information and carry out audits unless otherwise provided by legal provisions and work agreements. The Code of Professional Ethics has been endorsed by the Board of Directors of THPA SA and only the Board may amend or repeal it. Any eventual amendments or repeals are notified accordingly.