

KOLIÓS[®]
THE GREEK DAIRY

**CODE OF ETHICS &
PROFESSIONAL CONDUCT**

KOLIOS S.A. GREEK DAIRY



The Code of Ethics and Professional Conduct of the Company establishes standards of conduct for all its employees, as well as for its providers and suppliers. The purpose of this Code is not to establish rules for any case, but to set the operating principles of the Company and to clarify the employees' scope of activity, where performance of duties is concerned.

Some of the principles included in this Code derive from the Law or relevant regulations. For this reason, non-compliance with these principles of the Code may result in civil or even criminal liability of the offender.

The principles of the Code are part of the employees' duties towards the Company. Supervisors, in the context of proper execution of their duties, should ensure that the Code is applied by all members of their team.

In cases not explicitly covered by the Code, employees may seek assistance of the Legal Service of the Company.

A. WORKING ISSUES

The Code is governed by the spirit of the Social Responsibility Code, which is the result of cooperation between companies, non-governmental organizations, trade unions and the Ethical Trading Initiative.

The main effort of the Initiative is to promote and improve the implementation of some basic rules concerning working conditions across the entire spectrum of the supply chain.

Its aim is to ensure that the working conditions of those working for the production and distribution of products across the supply chain are in line with, or better than those provided by the local legislation.

For this reason, a set of nine basic rules has been established, viewing at boosting the trust of employees at all levels, and at encouraging employees to act in accordance with such rules. These rules, presented below, which the company "KOLIOS S.A. GREEK DIARY" has committed to comply with, are the following:

1. EMPLOYMENT IS FREELY CHOSEN

1.1 Employment may not be involuntary, compulsory or forced and imposed without the consent of the employee.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

2.1 2.1. All employees, without any exception, have the right to join or form trade unions of their choice and to negotiate collectively (Law 1264/1982 and Law 1767/1988, as in force each time).

2.2 The employer shall adopt a positive attitude towards the activities of the trade unions and their organizational needs.

2.3 There is no discrimination or bias against employees' representatives, the latter being given the opportunity to perform such duties in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

3.6 Under the current conditions (occasional but with obvious durability) arisen due to Covid-19 pandemic, the company shall be establishing and repeatedly announcing clear instructions for the staff, to safeguard the health of all workers, as such instructions are adopted by the competent Ministries. The Company also prepares and implements a health control program for Covid -19 for all employees, observing all legal safeguards when receiving and processing their personal data.

4. CHILD LABOR SHALL NOT BE USED

4.1 Child labor will not be used.

4.2 Companies develop or participate in and contribute to programs that aim to relieve the work of any child found to be performing child labor, so that he or she can participate and remain in quality educational programs until adulthood. A "child" is defined as a person under the age of 15 or under the age of completion of compulsory education.

4.3 Children and young people under the age of 18 will not be hired for night work or to work under hazardous conditions.

4.4 The above policies and procedures shall be adapted to the relevant provisions of ILO standards (International Labor Organization).

5. LIVING WAGES ARE PAID

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Reductions or deductions not provided for by national law are not permitted without the express consent of the employee to whom they relate. All disciplinary measures shall be filed and complied with by the company's personnel management.

6. WORKING HOURS ARE NOT EXCESSIVE

6.1 Working hours shall comply with the national law, collective agreements, and the provisions 6.2 to 6.6 below, depending on which of the two offers the greatest protection to the employee. Items 6.2 through 6.6 are based on international labor standards.

6.2 Working hours, excluding overtime, should be defined by contract and should not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime should be used responsibly, taking into account the following: frequency, regular working hours of each employee and the workforce as a whole. They should not be used to replace regular employment. Overtime shall always be paid with higher pay, which is recommended to be no less than 25% on top of the normal pay.

6.4 The total working hours, in any period of seven days, shall not exceed 60 hours, except as established in clause 6.5. below.

6.5 Working hours may exceed 60 hours in a period of seven days only in exceptional cases where all of the following criteria are met:

- this is allowed by national law
- this is allowed by a collective agreement which is a product of free negotiation between a workers' organization that represents a significant part of the workforce
- appropriate measures to protect the health and safety of workers have been taken
- the employer can demonstrate that exceptional circumstances apply, such as an unexpected need for production, accidents or emergencies.

6.6 All employees shall be offered at least one day off in every 7-day period or, where permitted by the national law, two days off in every 14-day period.

7. NO DISCRIMINATION IS PRACTICES

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. REGULAR EMPLOYMENT IS PROVIDED

8.1 The Company shall make any effort to ensure that work is in accordance with the employment relations recognized by law and common practice at work.

8.2 Obligations to employees designated by labor legislation or legislation on social security, resulting from the permanent employment relationship shall not be avoided through the use of special contracts or arrangements for remote work or apprenticeship contracts in the absence of an actual objective of acquiring special skills or an objective for permanent employment, nor should such obligations be avoided by overusing fixed-term contracts.

9. NO HARSH OR INHUMAN TREATMENT IS ALLOWED

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

B. ENVIRONMENT PROTECTION ISSUES

1. Full compliance with the applicable laws and regulations in relation to the environment protection is an obligation.

2. Production operations are performed in the newly built and sophisticated proprietary production plant of the Company. The design and layout of the unit include the most modern technologies in reducing the environmental impact, while use of renewable energy sources in the future is also planned.

3. All production plant waste is subject to integrated management. All categories of plant wastewater are routed to a central wastewater treatment system for pre-treatment. Continuous inspections are applied according to a followed procedure.

All burners operate in accordance with regulatory requirements as per emission standards. Gas emissions are constantly monitored and recorded according to a relevant procedure.

Packaging waste is separated before being sent for recycling.

C. CONSUMER ISSUES

1. CONSUMER HEALTH AND SAFETY PROTECTION

The Company produces high quality products, production being based on a Quality Management System. The quality and safety of the Company's products, but also of those it trades, are non-negotiable components.

The Company takes all possible protection measures and carries out all necessary quality controls on its products, in order to ensure the health and safety of consumers. All stages of the production process are governed by the highest hygiene standards, and the strictest quality controls are applied. The Company also ensures that it receives all the necessary certifications for raw materials and materials in general being used in its production process, in cases where this is required either by the Law or due to an internal procedure. The Company applies an integrated and certified System of Quality Management and products, production, in accordance with the highest international standards, and with the following certifications: ISO 22000, ISO 9001:2015, BRC (British Retail Consortium Global Standard - Higher Level), IFS (International Food Standard - Higher Level), as well as AGROCERT (for PDO products), BIO HELLAS (for Organic products) and V-LABEL (for products suitable for vegetarians and Vegans).

It is noted that the protection offered by the products covers both the intended use and the possible misuse. Therefore, clear instructions are included in each package. Given the fact that not all risks can be predicted, the Company has adopted a series of measures to protect the safety of users, and has incorporated mechanisms activating withdrawal or recall of a misplaced product that has been put on the market despite the security measures.

The safety of the Company's products is also ensured by internal procedures, regardless of and in addition to the current legal framework.

2. CUSTOMER SERVICE – TROUBLESHOOTING

The Company should have introduced mechanisms for consumer support, complaints collection, and dispute resolution. It therefore takes the following actions:

- The Company, in addition to the consumer line, has set up a team, consisting of two specialized employees, for a home visit in case of product failure, if required.
- The production plant hosts a specialized department to monitor and implement the regulatory framework, as announced by bodies such as EOF (National Organization for Medicines) and EFET (Hellenic Food Authority).
- The Company provides clear advice to consumers on proper use, as well as on dealing with cases of misuse.
- The level of consumer satisfaction is regularly checked through surveys conducted by specialized providers.



D. OPERATING PRACTICES OF THE COMPANY

All applicable laws and regulations should be complied with, including those relating to the manufacture / production, pricing, sale and distribution of goods.

The Company develops and manufactures products strictly following the latest regulatory requirements of the EU regarding safety and protection of the environment.

E. INFORMATION AND PERSONAL DATA PROTECTION ISSUES

KOLIOS S.A. thinks that respect for and protection of the personal data of employees, suppliers and other associates is a commitment. The Company processes Personal Data in accordance with the Law, as it collects and processes such data exclusively for defined, explicit and legal purposes and only to the extent necessary for the implementation of such purposes. It takes care that the data kept by the Company are accurate and up to date, seeking, to this end, the assistance of the data subjects, i.e. the natural persons whom this data relates to, and keeps the data for as long as is necessary for the implementation of the specific purposes. People who manage personal data are trained to use the appropriate procedures. Representatives and authorized users are required to keep personal data confidential and not to use it for any purpose other than those serving the legitimate purpose for which they were collected, and only for that specific period of time. The company implements security measures at technical and organizational level, in order to secure the data collected, against any intentional or unintentional attempt, manipulation, loss, destruction or general access by an unauthorized person. Where personal data is collected and processed, the information shall be circulated in an encrypted form, to avoid any misuse of such data by any third party. The security measures are subject to continuous re-inspections and reforms, in accordance with the latest technological developments. The subjects of personal data have the following main rights: a) the right of access, b) the right of correction, c) the right of deletion ("right to be forgotten") , d) the right to restrict processing, e) the right of objection, (f) the right to transfer data, (g) the right to complain to a supervisory authority; and (h) the right to withdraw consent. To verify compliance with the legal procedures in order to safeguard the personal data, the Company has a Data Protection Officer ("DPO") and a dedicated e-mail address (dpo@kolios.gr) on any relevant issue.



F. APPLICATION OF THE CODE OF ETHICS AND PROFESSIONAL CONDUCT- BREACH

1. APPLICATION

Companies applying a Code of Ethics and Professional Conduct shall comply with national or other applicable laws, and where provisions of the law and this Code on the same subject exist, it shall follow whichever offers greater protection to the employee. Management members and employees shall comply with the requirements of this Code.

All employees shall ensure that these rules are applied by their colleagues.

In case an illegal or immoral act or practice prohibited by the Code is found, this shall be reported directly to the Chief Executive Officer, or to the Human Resources

Manager of the Group, or to the Head of the Group Legal Service, or to the Head of the Group Internal Audit. The way of reporting such issues is included in the Reporting Process, Code of Ethics and Professional Conduct. Reporting may take place via email or letter (by post, or by using the company mail delivery service).

Finally, to the extent possible, partners of the Company should be encouraged to apply the principles of this Code.

2. BREACH

Non-compliance with the rules of the Code of Ethics and Professional Conduct is treated as a misdemeanor and disciplinary sanctions may be imposed in accordance with the applicable law.

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