

CODE OF CONDUCT
FOR THE SUPPLIERS
OF FOURLIS GROUP

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1. Introduction

The societe anonyme under the name "FOURLIS HOLDINGS SA", as well as its affiliated companies, which are fully consolidated and constitute "FOURLIS Group" (hereinafter, the "Group"), have established and apply a Code of Conduct, that binds all human resources of the Group, and aims at ensuring the compliance with the regulatory and institutional framework, as well as the showing-off of attitudes that do not insult the image, the fame and reputation of the Group. Respective attitudes are also expected by the suppliers of the Group. In this framework, the Group asks from the suppliers to acknowledge and comply with this Code of Conduct for Suppliers (hereinafter referred to as the "Code"). The Code shall constitute an integral part of the contracts with the suppliers (it shall be attached as Addendum to the contracts).

1.1 Definition

The term "supplier" means any cooperation of the Company with the contractor/subcontractor, external partner, service provider, outsourcing provider and supplier.

1.2 Purpose

The Code has a unique goal to provide guidelines in relation to the business conduct of the Group's suppliers.

If the contract already concluded between the Group and the Supplier contains stricter terms than those included in the Code, then the terms and provisions of the contract shall prevail.

3. Labour practices

The suppliers/partners are obliged to promote and care about the guarantee and protection of the human rights, the respect at the workplace, as well as the honest conduct and uprightness among the co-workers. They are obliged to adopt policies, procedures and practices that recognize, encourage, and appreciate diversity, different views and experiences, whereas at the same time support the honest and mutual communication always in a spirit of adaptability, conciliation and compromise.

3.1 Prohibition of forced and child labour

Any form of forced labour constitutes a violation of human rights and the Group's suppliers should prohibit it. The provision of work must be characterized by freedom and be made according to the laws of the country where business activities are performed.

Further, the Suppliers should strictly prohibit the employment of individuals who are under the lawful limit of adulthood, pursuant to the applicable laws.

3.2 Working Hours and Fees for work provided

The working hours, the licenses and the overtime of the Supplier's personnel should be in compliance with the relevant national laws and a respect to the relevant workers' rights should exist

The employment terms should be fair and reasonable and in compliance with the forecasts of the applicable labour laws

The remuneration to the human resources of the Supplier should be paid in accordance with the terms and provisions of the applicable labour laws.

3.3 Avoidance of violence, harassment & discrimination

The equal and fair behavior and conduct to the workers should characterize the Group's Suppliers. They must show zero tolerance to any form of discrimination, verbal or other harassment, or violence at the workplace. They must comply with the applicable laws on the provision of equal opportunities of employment, also including those related to the prohibition of discrimination, harassment, and insulting treatment phenomena.

4. Hygiene and Safety

4.1 Labour Safety – Safe and Secure Facilities – Existence of emergency response systems

The application of hygiene and safety rules for the human resources at the workplace is necessary for the protection of the human life.

In this respect all Group's Suppliers are obliged and committed to provide and ensure, for all their co-workers, a healthy and safe work environment, focusing on the prevention and minimization of the risks of accidents, injuries and exposure to health risks, according to the relevant applicable legislative requirements.

In this framework, the Suppliers have the obligation and are committed to detect the possible risks for their employees, as well as to take the preventive measures deemed necessary.

In addition, each Supplier is obliged to provide its human resources with sufficient and regular education and training on health and safety issues, as well as in relation to the method of use and application of the appropriate individual protection equipment, provided there is an obligation for use of such equipment.

In this respect, the above Supplier is obliged to apply and implement suitable procedures on the treatment and dealing with emergency cases, such as, indicatively, procedures on the provision of first-aid services, evacuation procedures and fire-detection procedures.

4.2 Avoidance of drugs use

Every Supplier must not allow its human resources to consume alcohol or drugs during work. The abuse of alcohol, drugs and other psychotropic substances at the workplace may cause a severe problem to the health, safety and work performance.

5. Legislative and Regulatory Compliance

The guarantee of compliance with the national and regulatory framework constitutes obligation of the Group's Suppliers.

5.1 Bribery, Corruption, Fraud

The Group's Suppliers must show zero tolerance to any form of bribery, corruption and fraud.

They are obliged to have established and apply policies and procedure on the preventive and repressive treatment of any such incident.

5.2 Conflict of Interests

The Suppliers are obliged to make any effort so that circumstances that might be considered as resulting in conflict of interest between the companies and the Group are prevented.

5.3 Avoidance of Unfair Competition

The Group's Suppliers must comply with the rules regulating the trade's practices, the competition, and prohibit the creation of monopolies.

They are obliged to abstain from any behavior that could be considered as unfair competition pursuant to the relevant laws.

5.4 Protection of Information and Personal Data

Provided that the Suppliers, due to the nature of the service or the product provided to the Group, acquire access to confidential or secret Group's information, they are obliged to keep these information secret. Further, the management, the processing, as well as the disclosure of the said information must be made only to the competent authorities or to persons who are known to the Suppliers as being specially authorized to this end, and always in compliance with the provisions of the applicable laws.

Further, the Suppliers are obliged to comply with all applicable provisions on the protection of personal and sensitive personal data. Moreover, they are obliged to fully cooperate in possible future checks/controls or investigations organized both by competent officers of the Group as well as by public authorities.

5.5 Protection of Facilities and of Intellectual Property

The Suppliers are obliged to respect and not allow any act that constitutes a breach of the Group's rights in relation to its facilities or regarding its intellectual property.

In this respect they are obliged to ensure the implementation of the relevant laws.

5.6 Products and Services

The products or the services offered by the Suppliers to the Group must comply with the specifications and the safety requirements, specified by national laws.

5.7 Environmental Protection and Protection of the interests of interested parties

The Suppliers are obliged to comply with the applicable laws on environmental protection, and make any possible effort in order to reduce their environmental footprint, via proper management and processing of natural resources and mediation of greenhouse gas emissions, aiming at the limitation of the relevant effects on the environment and society in general and at the contribution to tackling the climate change phenomenon.

6. Compliance with the provisions of this Code

All Suppliers of the Group are obliged to ensure their compliance with the provisions of this Code. In case that the work – products or services – that has been assigned to them or that they intend to undertake on behalf or in cooperation with the Group, is performed or will be mainly performed and executed by their agents, subcontractors or/and suppliers, the latter are also obliged to comply with the provisions of this Code.

The Group may check the compliance or non-compliance of the Suppliers with the Code. For this purpose, it may ask from its Suppliers to allow a Group's representative to visit the Suppliers' facilities, so that a verification and checking of the degree of compliance with the Code is made. In this respect, control procedures

shall be applied, that are deemed as suitable for the specific control (indicatively referred as sampling check).

The Group has a Code of Conduct Hotline – Whistleblowing System, via which concerns about violations of the Code or non-compliances with the applicable laws may be referred to by anonymous or identified individuals. The Code of Conduct Hotline – Whistleblowing System operates 24/7.

The relevant reports may be submitted via the following alternative channels:

- By a telephone report to the Code of Conduct Hotline of the Group – tel.2106293010
- Through a request for a personal meeting (live or by a conference call) with the Head of the Group’s Regulatory Compliance, within reasonable period of time from the date of the request. The request is submitted by e-mail to the address: codeofconduct@fourlis.com or to the address: compliance@fourlis.gr in writing or by a phone call to the Code of Conduct Hotline tel.2106293010. In each case of report filing according to the above, every possible effort is taken, so that the person’s identity, as well as the information included in the report is kept confidential. In this respect the information is disclosed only in the case that this is required by the applicable laws or when the said disclosure is inevitable for conducting an effective investigation and taking the appropriate measures.