

This Code of Ethics reflects the principles, values and commitments that govern the operation of SSA. Its purpose is to ensure that all business activities are conducted with integrity, transparency and respect for people, society and the environment, in full compliance with applicable Laws and relevant Standards.

The Code applies to all individuals of SSA, irrespective of the department in which they work and the title/ rank they hold, including senior managers, senior employees, directors, members of Committees and Boards of Directors, employees (permanent, fixed-term or temporary), consultants, contractors and trainees (students). The company encourages all partners, subcontractors, suppliers and other external providers involved in its operations to comply with its fundamental principles. In cases of significant or long-term collaborations, the company may request written and signed acceptance of this Code. SSA's Management is committed to promoting the principles of the Code, as well as awareness and participation among all employees, and to ensuring that they act in accordance with the company's core values.

### **Business Ethics and Professional Conduct**

We are committed to acting with integrity, transparency and professionalism in all business activities, maintaining the trust of our customers, partners and other stakeholders. All executives and employees are expected to act responsibly and objectively, avoid actions that could threaten the company's legal compliance or reputation, use the available communication channels to report any unsafe or unethical incidents and represent the company with respect, professionalism and respectful behaviour, contributing to its positive standing and credibility.

### **Compliance with Laws and Regulatory Frameworks**

SSA operates in full compliance with the applicable legislation and regulatory frameworks governing its activities in Greece and abroad. Adherence to Laws, regulations, contractual obligations and international Standards is a non-negotiable principle for the company and all its personnel. We recognize that responsible and lawful operation is a key factor in maintaining reliability, sustainability and trust among our customers, employees and the broader society.

### **Financial Integrity and Transparency**

We are committed to managing all financial transactions with complete transparency and integrity, in accordance with applicable legislation, accounting Standards and internal procedures. All executives and employees must ensure that financial records and reports are accurate, complete, and objective, avoid any actions that could result in personal or unlawful gain and follow the established approval and expense control procedures. In this way, the company protects its lawful operations, maintains the trust of its clients and partners and upholds its reputation for reliability in the market.

### **Human Rights and Work Environment**

SSA recognizes that respect for human rights is a fundamental principle of its operations and an integral part of its corporate culture. The company conducts its activities with respect for human dignity and values, ensuring that every individual has the right to a workplace free from violence, harassment and discrimination. In compliance with national and European legislation, a dedicated Policy has been established ensuring that all employees- regardless of gender, age, religion, nationality, disability, sexual orientation, or any other personal characteristic- are treated with equality, respect and fairness.

**Occupational Health and Safety**

The protection of the health and safety of employees, partners and any third parties potentially affected by our activities is of the highest importance. The company implements an Occupational Health and Safety Management System in accordance with the international Standard **ISO 45001**, with the aim of:

- Identifying, assessing and controlling occupational risks associated with its activities.
- Preventing work-related accidents and illnesses.
- Providing safe facilities, tools and equipment.
- Encouraging active employee involvement in the Management System through regular consultation.
- Providing training and information on health, safety and risk prevention.
- Continuously improving working conditions.

All employees, regardless of position or role, are responsible for following safety instructions, using the required Personal Protective Equipment (PPE) and promptly reporting any hazards, incidents, or unsafe practices.

**Integrity and Anti-Corruption / Anti-Bribery**

SSA is committed to conducting all business activities with full integrity, transparency and honesty. Any form of corruption, bribery, fraud, or unfair practice is strictly prohibited and an Anti-Bribery Management System is implemented in accordance with the international Standard **ISO 37001**. The company is committed to:

- Identifying and assessing potential risks of bribery, corruption or conflicts of interest in its activities and implementing financial and organizational measures to prevent and address suspicious incidents.
- Establishing limits regarding gifts, financial amounts, supplies or benefits that could be considered bribery or influence professional judgment and decisions.
- Providing relevant training and awareness programs for the company's Personnel.
- Implementing whistleblowing procedures for confidential reporting of corruption or irregularities, protecting reporters from retaliation.
- Investigating promptly and objectively any report or suspicion of violations.

All company employees are expected to uphold the principles of honesty, transparency and professional ethics and to avoid any unfair practices.

**Environmental Protection**

Environmental responsibility is not only a regulatory obligation but also a commitment of respect for society and future generations. Protecting the environment is fundamental to achieving sustainable development and represents a key element of our overall corporate responsibility. To improve our environmental performance, an Environmental Management System is implemented in accordance with the **ISO 14001** Standard, with the aim of:

- Identifying and controlling the environmental impacts of SSA's activities.
- Preventing pollution and reducing emissions, waste, energy consumption and consumption of natural resources.
- Managing hazardous materials and waste responsibly.
- Promoting recycling, energy efficiency and the use of environmentally friendly technologies.

All employees are expected to actively contribute to environmental protection by following the established procedures and promptly reporting any incidents or practices that may pose a risk.

**Personal Data Protection**

SSA is committed to recognizing the fundamental right of individuals to the protection of their Personal Data. The processing of such data must serve individuals and operate within a framework of lawfulness, fairness, transparency, integrity and confidentiality. In compliance with national and European Legislation, procedures are implemented to ensure the lawful management and protection of personal data. The company is committed to:

- Processing personal data lawfully, for specific and legitimate purposes.
- Collecting and retaining only the data strictly necessary, for as long as required.
- Ensuring the accuracy, integrity and confidentiality of data through appropriate technical and organizational measures.
- informing data subjects of their rights and facilitating their exercise (e.g., access, rectification and erasure)
- promptly addressing any data breaches or leaks and taking the necessary steps to notify the relevant authorities.

**Information Security**

The company recognizes that Information, in any form, is a critical asset. For this reason, it has established and implements an Information Security Management System in accordance with the **ISO 27001** Standard, aiming to protect the confidentiality, integrity and availability of information. Additionally, the company maintains a Registry where strategically Important Data is stored, complying with the National Regulation for Industrial Security (SSA holds Industrial Security Certification). The company is committed to:

- Assessing risks and updating security procedures and Policies.
- Ensuring the confidentiality, integrity and availability of its information.
- Implementing technical and organizational security measures, such as access control, encryption, backups and system monitoring.
- Managing security incidents promptly and effectively, following reporting and recovery procedures.
- Training and raising awareness among personnel on information security principles and practices.

**Reporting Channels**

You can safely and confidentially report any incident, concern or violation of the Code of Ethics, as well as of the company's Policies and procedures, through the following communication channels:

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|-------------------------------|---|
| Email: healthandsafety@ssa.gr | For health and safety and harassment or violence-related issues   |
| Email: abcfuction@ssa.gr      | For bribery and corruption issues   |
| Email: ssa@ssa.gr             | For any other issue, by contacting the Quality Manager, Information Security Manager, or a member of Top Management |
| Tel.: +30 2106725106          |   |

You may submit your complaint anonymously by traditional way  
Ethnikis Antistaseos 84, Halandri Postcode 15231

Chairman & CEO  
Nikolaos Broudos

Date  
16 of October 2025