



Code of Professional Conduct

369AV PC

Message from the Managing Director

Our Goal and Promise

Our goal is responsible business.

Our Values, which reflect our philosophy and beliefs, shape our unique culture and define the way we work, play a key role in achieving this goal. Thanks to them, we define ourselves in the business arena.

Transparency, Accountability and Reliability form the structural chain of our value system, which contributes to our efficiency and effectiveness, while at the same time, it inspires us continuously in our daily contribution to the Greek society.

Who is covered by the Code of Conduct

All the rules of the Code of Conduct apply to all persons working for or associated with 369 in any way. Such persons include (by way of example):

- Persons working for 369 under a contract of employment of any kind.
- Persons who maintain an external partnership with 369 of any nature and in relation to any subject matter, being self-employed persons, executives of 369's suppliers, etc.

In essence, the Code of Professional Conduct applies to all those persons who are required to uphold the integrity and authority of 369, i.e. all those who have an employment relationship or act as its representatives or associates.

As such, 369 requires all external entities with which it does business to ensure that all of their employees, especially those who interact with 369, comply with the provisions of this Code and the individual 369 Policies.

The application of the rules of our Code of Professional Conduct applies to all of us throughout the course of our duties and beyond, in situations in which our conduct and actions may be associated with 369.



The Code of Professional Conduct provides a regulatory framework for 369 and operates in a complementary and subsidiary manner to the legislation in force. The rules laid down may be specified and/or extended by individual Policies of 369, always in accordance with the legislation in force.

At the same time, all of us must ensure that our relatives and, in general, persons directly related to us, refrain from any behaviour that could harm the interests and prestige of 369.

The Code of Conduct at a glance:

- A. Applying Transparency and Equality Rules Everywhere and Always**
- B. Practicing Professional Ethics**
- C. Protecting the Authority and Reputation of 369**
- D. Behaving with Respect**
- E. Competent Bodies to Monitor the implementation of and compliance with the Code of Professional Conduct and the Individual Policies**
- F. The validity of the Code of Conduct and its Review - Individual Policies**



A. We apply rules of Transparency and Equality Everywhere and Always

i. We act in accordance with our values, always in the context of 369

The guiding principle in the way every person who works for or works with 369 should always be the values that govern it: Transparency, Accountability and Credibility. We are accountable to the entire Greek Society and safeguard the prestige and credibility of 369, both in Greece and abroad.

ii. We take care of our Interpersonal Relations and protect everyone's Human Rights

369 promotes cooperation, honesty, open communication and equal opportunities, always respecting human dignity. The people of 369 are imbued with a sense of personal responsibility and set clear, appropriate and culturally sensitive boundaries that will govern interpersonal relationships between associates.

We have a duty to create a climate of trust by showing respect for diversity, including age, race, gender orientation, nationality, sexual orientation, religion, national origin, disability and professional experience of every person we work with. In this context, we must refrain from any offence to the personality and any form of harassment against any person.

B. We Practice Professional Ethics

All our senior managers lead by example. The persons - Heads of Departments of 369 lead by example, applying themselves with great diligence and dedication the provisions of the Code of Professional Conduct and its individual Policies. In addition, they have the duty to communicate, explain and inspire, among all their associates, the characteristics and culture of 369, so that all persons working for or collaborating with 369 become partakers of the values that 369 stands for.

Indicatively, they need to:

- reinforce and promote respect and honest communication,
- communicate the spirit and letter of this Code and individual 369 Policies,
- make clear the potential risks associated with the subject matter of the job,



- communicate honestly and respectfully with their colleagues and in general with the persons with whom 369 works, acting as an example,
- respond promptly, consistently and reliably to complaints, comments and remarks from partners and employees that come to their attention.

i. Preventing Conflict of Interest

We must be aware of, identify, manage and avoid conflict of interest situations. Conflicts of interest can arise because of our professional and personal activities, when our actions or interests prevent us from impartially and effectively fulfilling our duties to 369 and society.

The above also applies to relations and transactions with suppliers or external partners of 369.

The persons responsible for the monitoring, disclosure and assessment of conflicts of interest are the persons - Heads of the Divisions of 369 under the guidance of the Managing Director of 369. In cases where a question or doubt arises regarding the handling and assessment of such a situation and the evaluation of the existence or not of a conflict of interest situation, each and every one of us must bring it to the attention of the Head of Department to which they belong, who in turn must bring it to the attention of the Managing Director of 369.

More information on conflict-of-interest issues is provided in the 369 Anti-Bribery Policy.

ii. Prevent the occurrence of corrupt and bribery behaviour

A key commitment of 369 is to uphold the highest level of ethics and zero tolerance for instances of bribery and corruption. A commitment that applies as a matter of course to all of us.

Therefore, both we and our family members are not permitted to receive gifts of significant value, discounts, fees or other benefits, monetary or otherwise, from suppliers, customers and external partners in general. This restriction also applies to any attempt to offer gifts.



It is noted that the acceptance of small, symbolic gifts given in the context of courtesy and communication between employees and suppliers cooperating with 369 is not prohibited, provided that the acceptance of such small, symbolic gifts does not leave any room/reason for negative criticism against the person - recipient, is within the framework of reasonable, socially and professionally acceptable courtesy, and is legal and sufficiently documented.

Gifts other than those designated as symbolic/customary should be declared by the persons receiving them to the person - Head of the Department of 369 to whom they belong. In the event of an attempted offer of gifts (other than etiquette) or in cases where we are in doubt about the acceptance or non-acceptance of a gift by a supplier or partner, we must seek the assistance of the person - Head of the 369 Department to which we are assigned to put the offer up for approval for acceptance or denial by the 369 Managing Director.

In the unlikely event that we become aware of an incident of corruption or unethical behaviour in general, we must report the incident, as set out in our 369 Anti-Bribery Policy, in order to deal effectively with any such action or situation. For its part, 369 is committed on the one hand to take seriously any such report - complaint and on the other hand to protect any person working for or cooperating with 369 who makes the relevant report - complaint.

More information on bribery and corruption issues in general is provided in the Anti-Bribery Policy implemented by 369.

iii. Participate responsibly in social, political, voluntary activities

Our responsible participation in voluntary and community activities is welcomed and encouraged by 369, to the extent that it does not interfere with the performance of our duties, does not pose a threat to 369's reputation, and does not create a conflict of interest with 369.

We belong to a company that encourages our participation in charitable activities and encourages volunteering, without requiring prior consent for such activities. In any case, however, we must act responsibly to ensure that our daily work is not adversely affected by these activities. Persons working for or working with 369 are encouraged to discuss with their Head of Department any doubts they may have about the impact of such activities.

iv. Demonstrating care and attention in the context of our activities outside 369



With respect to our potential engagement outside of 369, it is expected that we must avoid engaging in any activities that could create a conflict of interest or in any way compromise the integrity and reputation of 369. In addition, we must ensure that any potential outside engagements do not interfere with our ability to perform our duties as set forth in our employment agreement with 369.

We should remember that conflicts of interest may arise due to our professional and personal activities when our actions and personal interests interfere or may interfere with our ability to perform our duties impartially and effectively.

C. We protect the prestige and reputation of 369

We uphold the values and represent the ethos of 369 at every level within and outside the 369 environment. Both in our professional and private lives, we represent 369 and what it stands for. Behaviours that are contrary to 369's values and beliefs will be considered unacceptable.

i. Maintaining Confidentiality at every level of our communication

Aiming to ensure the confidentiality of information between the various departments of 369, in addition to our personal confidentiality, we apply where necessary the system of "Chinese Walls", which extends both to the operation of the information systems and to the physical separation of the Departments and the persons employed in the Departments of 369. In this way we ensure that information is prevented from leaking outside 369 as well.

We maintain confidentiality even after we leave 369 and avoid discussing or disclosing data relating to the operation of 369.

ii. Respecting and caring for the assets of the 369

The assets of 369 include, but are not limited to, buildings and fixed equipment (e.g. all types of machinery, computers, offices, desks, drawers, cabinets, lockers, filing cabinets and general equipment used by staff in the day-to-day performance of their duties), software, networks and communication tools, information, databases of donors, grantees and beneficiaries in general, supplier data, studies, regulatory documents, archives, supplies, etc.



With regard to the means of communication available to persons working for or cooperating with 369, it is clarified that any communication using an electronic address, network or workplace of 369 is considered professional - official. Towards these intangible and/or tangible elements, we must exercise due diligence in their care and protection in order to ensure their integrity for the proper and smooth service of 369's business.

In addition, we need to know that all 369 assets should not be used for our personal benefit, and any concerns about their proper use should be reported to the person - Head of the relevant 369 Department or the 369 Managing Director.

iii. Maintaining and ensuring our responsible presence on Social Media

369 recognizes our need to participate in Social Media, the right to maintain personal accounts and to freely post our views on the relevant topics. However, it is recommended that we use them responsibly and correctly, in accordance with the current regulatory framework for their operation.

It is worth remembering that:

- i. We do not disclose Information relating to 369. Information Security is our central priority, and we have an obligation to safeguard confidential or internal information relating to the persons who enhance or benefit from 369's actions, our strategy, and in general the persons with whom we collaborate, as well as documents circulated on our internal electronic network (intranet) such as communications, contracts, etc.
- ii. We do not make Unauthorized Postings or Comments regarding 369. Only certain individuals who work for 369 are authorized to represent it publicly, so any position we take must be our personal opinion and not in any way related to our position of 369. We only post authorized posts related to 369 and do not comment on 369 issues that require legal support.
- iii. We ensure that the Imprint and Style of our Communications is consistent with the principles of 369. We manage the content of our posts responsibly, knowing that it remains visible to a wide audience and for a long period of time. We respect our audience, the copyright and privacy of third parties, we do not make eponymous references without the prior approval of those persons (especially donors, grantees and partners), we treat third parties with respect, decency and civility.



- iv. We comply with our obligations to 369. We follow the terms of our employment contract, especially those relating to Trust, Confidentiality, Representation and the rules of the present Code of Professional Conduct and the individual Policies, even when using Social Media in our free time.
- v. We act Responsibly even when we have the best intentions. Anything we post about 369 can potentially harm it, and harm us personally. When we publish material related to 369, we hold its communications image in our hands, and we must act so that 369 and we can only benefit from the digital presence.

Our active participation in the Social Media Networks must be done in a responsible manner: during working hours, exclusively to serve official needs; outside working hours, with respect for human dignity and without exposing us as professionals and persons who uphold the values of the 369.

iv. We protect Personal Data

369 fully complies with the European Union's General Data Protection Regulation 2016/679 (GDPR), the relevant law 4624/2019, the guidelines of the Hellenic Data Protection Authority and the relevant case law.

The European Union's General Data Protection Regulation has been in force since 25 May 2018.

The GDPR applies to the processing of any information relating to an identified or identifiable natural person.

Detailed information on the GDPR and the relevant legislative framework in general is provided by the Data Protection Officer (DPO) and the 369 Legal Service.

D. Behaving with respect

i. We support collaborative relationships and the continuous dissemination of information, promote teamwork at every level

We share information about another person's work, always with special care, in the context of confidentiality, non-conflict of interest and privacy. This ensures good cooperation between the collaborating persons and 369 departments, promotes teamwork at every level and ensures better employee performance and avoids misunderstandings both internally and externally.



ii. We always act with personal and overall safety in mind and take care of hygiene at both personal and collective level.

One of the most important priorities for 369 and for those of us who work for it is to ensure health and safety in the workplace. For this reason, all necessary measures are taken by the management of 369 with the aim of preventing and dealing with accidents and occupational diseases. Accordingly, we are committed to contributing, complying and strictly following the relevant directives aimed at our comprehensive protection. For 369, safety and hygiene at both the individual and workplace level is paramount.

E. Competent Bodies to monitor the implementation and compliance with the Code of Professional Conduct and individual policies

The competence for the day-to-day monitoring and guidance of the implementation of the Code of Professional Conduct and the individual policies of 369 lies with the Managing Director and the Legal Counsel of 369. In this context, they are authorised to process personal data available in computer systems, e-mail, etc., ensuring that an appropriate level of information security is achieved. Their purpose is to serve and uphold the standards outlined in the 369 Code of Professional Conduct and individual 369 Policies, to protect the interests, reputation and standing of the 369.

The company's Legal Counsel is responsible for the investigation and evaluation of nominal and anonymous complaints - reports concerning the violation of the rules of this Code of Conduct and/or individual Policies of 369, and shall give its opinion in writing to the Managing Director of 369, in accordance with the applicable individual 369 Policy, on the complaints - reports it processes and the appropriate measures to be taken in response, where applicable.

Within the framework of its tasks, the Legal Counsel is authorised to process personal data available in the computer systems, e-mail, etc. of the 369, taking appropriate technical and organisational measures to achieve an appropriate level of information security. The purpose of the processing is to serve and support the standards outlined in the Code of Professional Conduct and the individual 369 Policies, to protect the interests, reputation and standing of 369.

Decision-making powers with regard to reports submitted are in principle vested in the 369 Managing Director.



F. The Validity of the Code of Professional Conduct and its Revision - Individual Policies

The Code of Conduct shall be reassessed and updated at regular intervals.

The initiative to speed up the revision of this Code with individual Policies lies with the 369 Managing Director and the Legal Counsel, taking appropriate initiatives to adapt the content and rules of this Code and any individual 369 Policies to any changes in the regulatory framework in force.

Athens, 01-10-2025

The Managing Director of 369AV PC

Tina Petrovic