



ELLAKTOR
GROUP

CODE OF ETHICS



"Our core values draw the path, and our Code of Ethics sets the principles on how to walk that path with integrity, transparency, and honesty each and every single day."

Efthimios Bouloutas
CEO of ELLAKTOR Group

FOREWORD

Welcome to our Code of Ethics

At ELLAKTOR Group we breathe life into works that accelerate sustainable growth and improve the quality of life in communities across the world. What we do, how we behave and what we say has an impact which defines our integrity standards, regardless of where we live or work. And it takes both collective and individual effort to achieve the goal of building an ethical and safe working environment and a better future for all.

This global reach is a testament to the quality of work our clients have come to expect from us and the trust that they bestowed upon us. This is a great privilege, but also a great responsibility. We must ensure with our actions that our people and our business partners remain healthy and safe, that we treat each other with respect, and that we act collectively as a corporate citizen role model.

And as our world is becoming more and more complex and demanding, with newly found challenges coming our way, it is essential that we keep true to our principles and remain vigilant that we act in transparency and in the right way. Our core values draw the path, and our Code of Ethics sets the principles on how to walk that path with integrity, transparency, and honesty each and every single day.

This Code is a key resource for finding answers when faced with challenging questions and decisions that need to be made. It signifies the Group's accountability, built on the dedication of our people to conduct business ethically and fully aligned with our core values; for one another, for our stakeholders and for the communities where we operate. Thus, whenever in doubt, no-matter how big or small the matter can be, I urge you to read our Code for guidance. And if ever unsure about the best course of action, please use any of the resources listed in this Code for advice. You will never face retaliation for asking questions or raising concerns in "good faith".

Thank you all for your continued dedication to our high Integrity standards.

Efthimios Bouloutas
CEO of ELLAKTOR Group



OUR VALUES



MERITOCRACY AND EQUAL OPPORTUNITIES:

We foster ethics, meritocracy, and equal opportunities in the workplace, and we respect diversity.



COLLABORATION AND EXCELLENCE:

We encourage team effort, collaboration, and excellence on both an individual and a collective level.



ACHIEVEMENT AND EFFICIENCY:

We are committed to the high quality of our work, the transparency, and the flexibility of our business operation, seeking the continuous improvement of our competitiveness.



INTEGRITY AND RESPECT:

We operate with transparency and environmental and social awareness, encouraging the respectful and dignified treatment of all people.



ENCOURAGEMENT AND ADVANCEMENT:

We invest in the know-how and the expertise of our people, and we support the process of continuous learning for their further development.



HEALTH AND SAFETY:

We operate with the health and safety of our people as our main priority.



INNOVATION AND BEST PRACTICES:

We invest in innovation, cutting-edge technologies and best practices aiming at the continuous enhancement of the way we operate.

*National Gallery,
Athens.*



*Acropolis Museum,
Athens.*

6



INTRODUCTION

1

THE CODE OF ETHICS 10

- ▶ What is the Code? 11
- ▶ Why we Need a Code? 11
- ▶ To Whom the Code Applies 11
- ▶ ELLAKTOR's Expectations from its Third Parties 12
- ▶ How ELLAKTOR Manages Compliance 12

2

HOW WE CONDUCT OUR BUSINESS 14

- ▶ Fostering a Healthy and Safe Work Environment 15
- ▶ Promoting Ethical Business Practices 15

3

OUR RESPONSIBILITY TO EACH OTHER 18

- ▶ Respecting Human Rights 19
- ▶ Providing Equal Opportunities 19
- ▶ Collaborating with Fair Treatment and Mutual Respect 19

4

OUR RESPONSIBILITY AS A CORPORATE CITIZEN 20

- ▶ Protect the Environment for a Sustainable Future 21
- ▶ Act Responsibly and Contribute to the Communities that we Operate 21
- ▶ Maintain Independence from Political Activities 22
- ▶ Sponsor with Integrity 22

5

CREATING TRUST WITH OUR BUSINESS PARTNERS AND OUR CLIENTS 24

- ▶ Respecting our Clients 25
- ▶ Maintaining a Responsible Supply Chain Process 25

6

CREATING TRUST WITH OUR INVESTORS AND THE PUBLIC 26

- ▶ Maintain Accurate Records & Reporting 27
- ▶ Carefully and Properly use Physical Assets 27
- ▶ Protect Intellectual Property (IP) and Confidential Information 27
- ▶ Do not Engage in Insider Trading 28
- ▶ Use Social Media Responsibly 28
- ▶ Communicate Reliably with Investors and the Public 28

7

LIVING THE CODE 30 7

- ▶ Raising a Concern or Reporting an Incident 31
- ▶ Resources for Support and Guidance 31

INTRODUCTION

At ELLAKTOR Group, hereinafter referred as “ELLAKTOR”, we are committed to ethical and legal conduct in all our interactions, our compliance requirements, and our business activities. To abide by this commitment, we all share a responsibility to understand applicable standards and expected behavior. We must all respect and obey the law, when performing our duties. Ignorance of the law is no excuse, and it is especially necessary to be aware of the issues related to carrying out our work.

Our reputation is a direct outcome of how we: communicate, engage with each other and everyone else, decide and act upon our decisions. This is how we build and maintain trust with each other and all our stakeholders. Whether we work in Construction, Concessions, Environment, Renewable Energy Sources, or Real Estate Development & Services, we all share the same values that drive our behavior and our actions.

8

**While our Values set
the **tone**, our Code of Ethics
defines what we expect
from each other**

Marina Alimou,
Attika.



1 THE CODE OF ETHICS

10

Athens Ring Road.

▲ What is the Code

The Code is a set of fundamental principles and rules that shape the framework of how we act and how we behave in everything that we do. It sets forth the ethical standards, responsibilities, and commitments on how we work, how we interact with each other, how we collectively act as a good corporate citizen and how we build and maintain trust. The Code is an integral part of the **Integrity Compliance Program**.

▲ Why we Need a Code

We live in a complex world that has many laws, regulations, standards and expected behaviors that we all have a responsibility to abide by. The Code is our guide on how to navigate through this complexity and ensure that we do the right thing every time. Whenever we face a difficult situation, or we have a doubt of what is right, the Code is here to help us with our decision.

While the Code covers the most common and critical aspects of our daily conduct, it is not and cannot be exhaustive. It is meant as a starting point to provide guidance and help you find the available resources if you need more information.

This Code does not necessarily include all the legal and regulatory provisions that may apply to a particular region, and in cases of contradictory or conflicting provisions, the applicable legal and regulatory framework of each particular region shall prevail.

▲ To Whom the Code Applies

The Code applies to all ELLAKTOR employees, regardless of their type of employment (e.g., part time, full time, contract type, etc.), and the employees of any controlled entities by ELLAKTOR.

Employee Responsibilities

Every Employee is responsible to gain a basic understanding and comply with the Code and its provisions.

As an Employee you must understand ELLAKTOR Policies and procedures relevant to your job, be familiar with Compliance resources available to you including Talk2Ellaktor procedure and raise any concerns regarding a potential violation without delay.

Manager Responsibilities

Every person in ELLAKTOR that has a managerial position is expected to behave as a role model for the Code and its provisions, in addition to the responsibilities as an employee.

As a Manager you have increased obligations as regards to complying with this Code. You must ensure that you not only “talk the talk” but also “walk the talk”.

You must cultivate an environment of openness and transparency that promotes speaking up without any fear of retaliation, support others in their understanding of the Code and its provisions, and always behave within the context of the principles of the Code.

▲ ELLAKTOR's Expectations from its Third Parties

Third Parties interacting with ELLAKTOR, such as business partners, suppliers, contractors, subcontractors, intermediaries, customers, and anyone providing services to the Group companies or acting on behalf of the Group, are expected to uphold and apply the same requirements and principles contained in this Code and avoiding causing or contributing to activities that violate the principles of the Code.

For more information, please refer to the “Business Partners Code of Conduct”.

▲ How ELLAKTOR Manages Compliance

Commit - Assess - Act - Monitor: Always Improve

ELLAKTOR's **Integrity Compliance Program** encompasses all the available tools and resources to uphold a culture of Integrity.

The program follows a risk-based approach, global best practices, is dedicated to continuous improvement and is updated regularly.

Through our Integrity Compliance Program, we:

- ▶ engage in actions that are designed to ensure compliance with the Code, that is prevent, detect, and remediate any breaches of the Code,
- ▶ take reasonable measures to mitigate integrity risks that may impair our reputation or affect our operations (e.g., adverse media, imposed sanctions, etc.) and
- ▶ implement preventive and detective internal controls to ensure compliance with our Integrity Compliance Program and relevant Policies and Procedures.

12

For more information, please refer to the “The Integrity Compliance Program”.

ELLAKTOR's Integrity Compliance Program encompasses all the available tools and resources to uphold a culture of Integrity

Rion - Antirion
Bridge.



2 HOW WE CONDUCT OUR BUSINESS

14



*Moreas Motorway,
Peloponnese*

We operate in many countries around the world, focusing on projects that directly or indirectly affect people’s living standards. We have the responsibility to understand and follow the laws and regulations of each country that we operate in, and to conduct our business ethically. This is what we expect from ourselves as well as our Third Parties on every single day and in every single activity. We cultivate a corporate culture that encompasses the following:

▲ **Fostering a Healthy and Safe Work Environment**

Our greatest asset and priority are our people. For this purpose, we work every day to maintain a safe and healthy work environment for all.

Occupational Health and Safety Rules for Employees at work are a requirement for protecting human life.

We follow global best practices and global standards set by the International Labor Organization (hereinafter referred as “ILO”) to create, maintain, and improve a robust organizational health and safety program for ELLAKTOR. We conduct frequent health and safety risk assessments across all ELLAKTOR Group entities, projects, and operational segments (construction, renewable energy sources, environment real estate & development services, and concessions), to identify new threats and improve our efforts in minimizing health and safety incidents.

Our commitment to a healthy and safe work environment is reinforced by our zero-tolerance to any deviations from it. We take all necessary preventive measures against accidents and occupational diseases at workplaces and at construction sites. We apply Certified Health and Safety Management Systems to all Group companies based on the OHSAS 18001/ISO 45001 standard, aiming at a unified and integrated approach to issues related to health and safety at work.

For more information, please refer to our “Health and Safety policy”.

15

▲ **Promoting Ethical Business Practices**

We have a responsibility towards ourselves and our stakeholders (Employees, Investors, Third Parties, Communities, Governments, and Clients) to engage in business practices that are ethical and legal.

ELLAKTOR has committed to Ethical Business Practices as part of our aligned sustainability strategy with the UN Strategic Development Goals of 2030. Our culture of Integrity applies a zero-tolerance policy to any form of Financial Crime (Fraud, Corruption, Market Abuse etc.) and any other form of unethical behavior through our robust Integrity Compliance Program.

For this purpose, we do not facilitate or participate in any action that will give or perceive to give an unfair advantage. We compete fairly in the market and do not condone any behavior or practice that prevents fair competition, such as: the bribery of public officials or any other person; the exploitation of dominant position to set selling prices in the market; the falsification of information to affect decisions; the manipulation of a bidding process; and collusion practices with any of the competing parties.

Fraud

A fraudulent practice is any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation. Fraud may be committed by one or more individuals and may involve either employees or/and third parties (customers, suppliers, subcontractors, etc.).

We do not tolerate any form of fraud and any actions or omissions that could expose us to fraud. We must report promptly all incidents of possible fraud or situations that could expose ELLAKTOR to fraud risk.

Bribery and Corruption

Corruption is the abuse of entrusted power for private gain. A corrupt practice is the offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to influence improperly the actions of another party.

Bribery is a form of corruption, and regards the offering, giving, or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted in contradiction to their legal duty.

ELLAKTOR applies zero tolerance to such incidents, complies with all applicable anti-corruption laws and conducts business transparently. We also implement an Anti-Bribery Management System certified as following the ISO 37001 standard.

It is expressly forbidden to offer or to promise or to provide any monetary or other benefit to a Public Officer or any other public entity or/and third party and to request or receive such benefit to secure and maintain or accelerate a commercial transaction, to procure a commercial advantage or favorable treatment. This also extends to anyone acting on our behalf.

Offering & Receiving Gifts and Hospitality

16

We embrace different cultures and customs and recognize that gift-giving and hospitality is an integral part of these different cultures and customs. Gift giving and hospitality must be transparent, modest, and reasonable. Any gift or hospitality cannot occur to obtain an advantage of any kind or to influence the outcome of a business decision. Expensive gifts and gifts of cash or cash equivalents are strictly prohibited.

For more information, please refer to our “Anti Bribery policy”.

Anti-Money Laundering

Money Laundering is the process of disguising illegally obtained funds from criminal activities such as fraud, corruption etc. and making them look legitimate. ELLAKTOR has put in place controls to prevent money laundering.

We always verify the origin of transactions to prevent the flow of illegal funds and are always alert for any transaction that looks suspicious or inappropriate. We always engage with third parties that are reputable and conduct their business in compliance with Anti-money Laundering laws and regulations.

For more information, please refer to ELLAKTOR Group “AML Policy”.

Promoting Fair Competition

ELLAKTOR complies with antitrust and competition laws and does not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e.g., regarding markets, customers, strategies, prices, and the like. All Business Partners and all persons acting on their behalf are expected to participate in public tenders and private sector bidding procedures by strictly following the applicable laws and regulations.

For more information, please refer to ELLAKTOR Group “Free Competition Policy”.

Protecting Information and Personal Data

We take appropriate measures to protect our information systems from unauthorized access. Considering our increasing reliance on information systems, we have designed and implemented a robust information security management system that applies the ISO 27001 standard, to minimize the risk of a data breach.

For more information, please refer to ELLAKTOR Group “Information Security Policy”.

Managing Conflicts of Interest

We all engage in social or professional activities that are not related to our work with ELLAKTOR. We need to be mindful that these activities do not generate a conflict of interest.

A conflict of interest occurs when personal interests interfere with ELLAKTOR’s business interests, such as when an employee is called to serve his or her own interests (financially or/and others) or the interests of a person (natural or legal) directly or indirectly associated thereto under a control relationship in a way that competes with the interests of ELLAKTOR.

These conflicts can be generated by our own activities or activities performed by our close family members. When faced with such situations, even if we are not sure, it is very important that we disclose them timely.

We avoid any conflict of interest, even giving the appearance of a conflict of interest, and carry out our personal and other activities in a way that does not conflict or give the impression of conflicting with the interests of ELLAKTOR.

We disclose promptly to our immediate supervisor or to Compliance Officer:

- ▶ Existing situations of conflict of interest,
- ▶ Any relationship or significant financial interest we may have with persons or companies with whom the Group cooperates and could lead to a conflict of interest.
- ▶ Other situations that may cause a conflict of interest.

17

In case of doubt, we must immediately inform our supervisor or/and the Compliance Officer for guidance.

For more information, please refer to ELLAKTOR Group “Conflicts of Interest Policy”.



*Psyttalia Wastewater
Treatment Plant, Attika.*

3 **OUR** **RESPONSIBILITY** **TO EACH OTHER**

18



We are responsible towards one another, wherever we live or work around the world, to treat each other with dignity and respect. Each one of us deserves a workplace that is inclusive and free of discrimination. We do our best work when we are free to speak up, we are compensated fairly, and we inspire one another to be our best selves. Different thoughts, abilities, experiences, and personal characteristics make our work environment richer and guide us to become better, decide better and achieve better results.

For more information, please refer to ELLAKTOR Group “Human Rights Policy”.

▲ Respecting Human Rights

One of our fundamental principles is our non-negotiable respect towards human rights, as these are defined by the United Nations’ International Bill of Human Rights and enhanced by OECD guidelines and the ILO standards. We are committed to respect human rights across our entire value chain, towards all our stakeholders and throughout all the communities that we live and work.



▲ Providing Equal Opportunities

Our greatest asset and our greatest priority are our people. We work hard in maintaining a work environment where people can flourish and thrive in every activity they engage. We strongly believe that we succeed when our people succeed. This drives our efforts for an environment of equal opportunities throughout the employment journey.

▲ Collaborating with Fair Treatment and Mutual Respect

We show our respect towards each other when we communicate and behave in a manner that does not make a person feel uncomfortable or an outcast. We ensure that we treat each other fairly in each and every interaction and regardless of a person’s age, gender, race, ethnicity, nationality, disability, sexual orientation, and religious or political beliefs. Any form of discrimination or harassment (i.e., sexual harassment, bullying, intimidation, etc.) is strictly prohibited.

4 OUR RESPONSIBILITY AS A CORPORATE CITIZEN

20



*Agora, Olympic Sports
Complex, Athens.*

We have a responsibility to be a good Corporate Citizen towards the environment and the communities that we operate in. Through our conduct and our actions, we show our respect towards our planet and our contribution towards the greater good. Our core values drive our strategy and operations towards our goal of good corporate citizenship, by integrating conducts and activities dedicated to:

▲ **Protect the Environment for a Sustainable Future**

Our planet is our home, and we acknowledge that we use its natural resources in our daily operations. We work continuously to improve our operations and reduce the impact of our environmental footprint, by applying global best practices and standards such as the guidelines of the European Network of Protected Sites Natura 2000 and the ISO 14001 standards. We invest in renewable energy sources, apply circular economy practices throughout our entire supply chain and waste management processes, and engage in activities dedicated to the preservation of biodiversity. We adhere to environmental laws and prohibit any acts of environmental crime.



▲ **Act Responsibly and Contribute to the Communities that we Operate**

We are committed to the communities that we operate, primarily through our regular business activities that are driven to improve people's quality of life. We are responsible towards these communities to operate with integrity and be true to our obligations towards them. Such obligations regard respecting cultures, paying taxes and social contributions, adhering to local laws and regulations, prohibiting forced or child labor, being accountable for our actions, and actin with transparency.

Recognizing the various challenges faced by some of the communities, we engage ourselves either individually or through our various corporate social responsibility programs in volunteering and donation activities. For the activities where we engage individually, whether this regards volunteering, donating, or playing an active role to a local community, we do that in our own time and as a personal contribution that is not related to ELLAKTOR or any of its entities. For the activities where we engage through our various corporate social responsibility programs, whether this regards volunteering or donating, we do that through our dedicated contribution process designed to ensure this act is performed in a charitable manner and without an expectation of something in return.

▲ **Maintain Independence from Political Activities**

We remain aware on political issues and changes that may impact our business, but we do not engage in any political contributions, regardless the value or form these contributions. Political contributions regard but are not limited to any goods, services, gifts, loans, funding of campaigns or events, use of corporate premises or equipment, towards a politician, political party, or political organization.

We respect the active participation of our colleagues to political processes and their involvement in public interest issues. However, these participations or involvements need to be performed at a personal level and must evidently indicate that they are completely independent and unrelated to ELLAKTOR and its entities.

▲ **Sponsor with Integrity**

We are an active organization in promoting best practices over various facets of our professional activities, such as: waste management, health and safety, workplace diversity, fighting bribery and corruption; improving internal controls and risk management, and others.

We engage in promoting these best practices as part of our corporate social responsibility activities. These activities may include the sponsorship of organizations for sport, cultural, educational, or other events and activities. For all such sponsorships, we ensure that they are of charitable or social nature and are offered only to organizations that are reputable and recognized. We provide these sponsorships through our dedicated sponsorship process designed to ensure that there is no expectation of gaining a commercial advantage or other privileged treatment in return.

We work continuously to improve our operations and **reduce the impact of our environmental footprint, by applying global best practices and standards**



5 **CREATING** **TRUST** WITH OUR BUSINESS PARTNERS AND OUR CLIENTS

24

*Acropolis Museum,
Athens.*

Our Business Partners and our Clients are an integral part of our value creation process.

It is very important to us that this value creation process is performed under the highest standards of integrity, with transparency, and in an environment of mutual trust and respect.

We acknowledge that certain aspects of our engagement with our business partners and our clients contain information that is considered sensitive and confidential. While we operate with transparency, we ensure that such information remains confidential before, during, and after our engagement with them ends.

For more information, please refer to ELLAKTOR Group “Business Partner’s Code of Conduct”.

▲ **Respecting our Clients**

Our clients are governed by different laws and regulations. When we engage with any of them, we ensure that we adhere with the applicable laws and regulations as well as their respective procurement policies and procedures.

▲ **Maintaining a Responsible Supply Chain Process**

We are committed in building trust with our third parties and ensuring integrity throughout our entire supply chain process. We earn their trust, by applying transparent and fair business practices during the selection process and throughout our cooperation. They earn our trust, by meeting the requirements of our selection process and by applying transparent, fair, and ethical business practices throughout our entire cooperation.

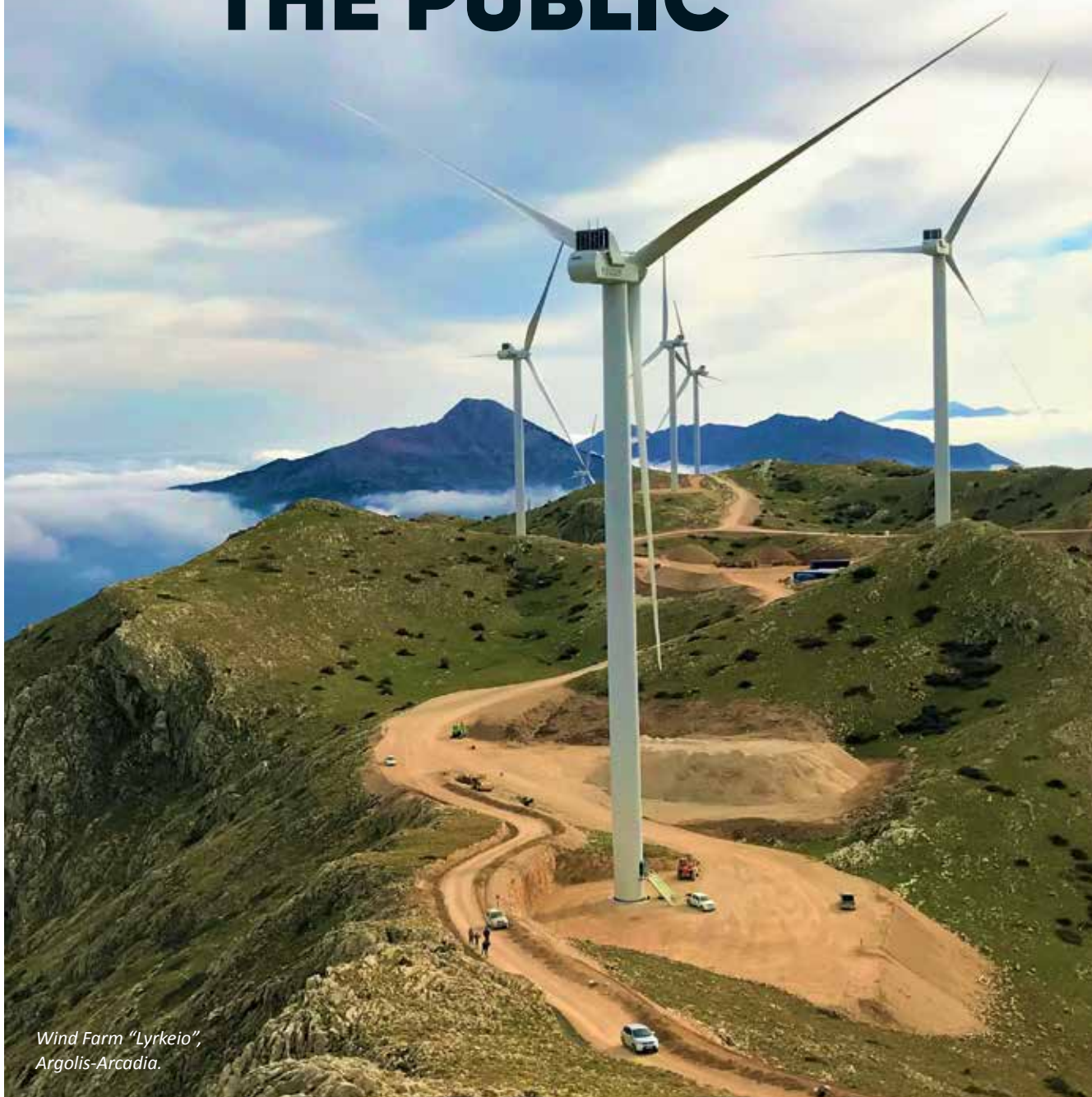
25

Our business partners are entities or individuals that operate either in local or in international markets and are also governed by different laws and regulations. When we engage with them, we ensure that we adhere with their applicable laws and regulations, and they adhere with our applicable laws and regulations.

It is very important to us that this value creation process is performed under the **highest standards of integrity, with transparency, and in an environment of mutual trust and respect**

6 **CREATING** **TRUST** WITH OUR **INVESTORS AND** **THE PUBLIC**

26



*Wind Farm "Lyrkeio",
Argolis-Arcadia.*

We are all ambassadors and protectors of ELLAKTOR reputation and its assets. We all have a responsibility towards our Investors and the Public to ensure that ELLAKTOR’s remains reputable, and its assets are used appropriately and for the intended business purposes. ELLAKTOR’s assets include, but are not limited to:

- ▶ physical assets such as corporate cars, credit cards, computers, equipment, property, etc.
- ▶ information assets such as intellectual property, confidential information, etc.

We exercise our responsibility to protect ELLAKTOR’s reputation and its assets when we:

▲ **Maintain Accurate Records and Reporting**

To meet our legal and regulatory obligations, we create and maintain accurate and complete records using recognized accounting standards and security measures. We need to ensure that our records and our reports are accurate, regardless of if they contain financial or non-financial information, such as timesheets, expense reports, financial reports, regulatory filings, or any other type of information.

Records must be maintained according to ELLAKTOR’s standards and in a manner that allows for these records to be accessible for any business, regulatory, audit, or other purpose. Any falsification, misclassification or mischaracterization of any information is strictly prohibited.

For more information, please refer to ELLAKTOR Group “Record Retention Policy”.

▲ **Carefully and Properly use Physical Assets**

Depending on the nature of our work, we are entrusted with the use of one or more of ELLAKTOR’s physical assets. These physical assets are placed in our care, to be used for a specific project, task, or activity. Each one of us is responsible to use them carefully for their intended business purpose only and never for personal or illegal purpose. We need to ensure that they are kept safe from loss, damage, misuse, theft, or any fraudulent use.

▲ **Protect Intellectual Property (IP) and Confidential Information**

We are also entrusted with intellectual property and/or confidential information to perform our work in a specific project, task, or activity. Intellectual Property regards any of ELLAKTOR’s patents, trademarks, copyrights, inventions, processes, or designs created on ELLAKTOR’s care. Confidential Information regard any type of information that is by nature or obligation sensitive and must not be made public or disclosed to any entity or person that does not have a legal right to it. Such information may regard but is not limited to business plans, financial information, client information, personal data that are protected under national or supernational laws (e.g., General Data Protection Regulation).

Each one of us is responsible to take the necessary precautions against unauthorized disclosure of this information and never use this information for personal gain.



▲ Do not Engage in Insider Trading

We believe that everyone is entitled to make investment decisions on fair grounds and on information that is publicly available. During our work, we might gain access to non-public information that can significantly impact ELLAKTOR's stock or other securities if disclosed. Having this knowledge makes us Insiders and we have a responsibility to keep this information confidential and not act upon it, until ELLAKTOR publicly discloses it. If we decide to act upon it, such as buy or sell ELLAKTOR's stock or other securities or disclose this information to others to buy or sell ELLAKTOR's stock or other securities, then we engage in Insider Trading which is not only against our beliefs, but it is also illegal.

▲ Use Social Media Responsibly

We acknowledge the importance of using social media as a tool to exchange information and participate in networking activities that are related to professional or personal interests. However, we must exercise caution on the content that we share, especially when this content relates to ELLAKTOR or its activities. We must all use social media responsibly and be sensitive to the nature and the impact of our comments, posts, and activities. We must never disclose confidential information about ELLAKTOR, our fellow Employees, our Clients, and our Business Partners. We must also never post anything that might constitute an act of threat, intimidation, harassment, or bullying.



28

▲ Communicate Reliably with Investors and the Public

We communicate with our investors, financial analysts, the media, and the public in an honest and clear manner. We understand that what we say and how we say it is important for our investors and the public, as this is the foundation of their trust and reliance upon us. We must ensure that the language used is proper, clear, and unequivocal, the feedback given is understood and the questions raised are addressed. For this purpose, we manage all communications with Investors and the Public through our dedicated Corporate Communications department.

*Attiki Odos, Katehaki
Junction Y1, Athens.*



7 **LIVING** THE CODE

30



ELLAKTOR
Headquarters.

Our Code is built upon the respective laws and regulations in the communities that we operate, our embrace of global standards and our adoption of what we consider as best practices. While we have made a great effort in capturing all the possible integrity challenges that we may face in our day-to-day work, we recognize that our Code cannot cover all possible challenges.

▲ **Raising a Concern or Reporting an incident**

It is our individual and collective responsibility to ensure that each one of us is upholding the Code and no one is above it. While this is a primarily responsibility of every Employee of ELLAKTOR, raising a concern or reporting a potential issue of misconduct can be done by anyone.

We expect everyone to report any concerns, issues of misconduct, potential violations of Law, the Code, relevant Policies and in general, any act or omission which could potentially harm ELLAKTOR or its reputation.


Even if you are in a situation that something just “doesn’t feel right”, you should always report your concern.

Reports can be submitted in confidence, or completely anonymously. All reports are treated confidentially and without any fear of any form of retaliation towards any person that in “good faith” raises a concern or reports a potential issue of misconduct. ELLAKTOR operates under a zero-tolerance principle for retaliation.

We take all necessary steps to maintain the confidentiality of the person and the information he/she has submitted, by disclosing them only where required by applicable law or where such disclosure is unavoidable for conducting an effective investigation and taking the appropriate measures.

For more information, please refer to our “Whistleblowing Policy”.

Talk2Ellaktor offers multiple channels for raising concerns or/and reporting incidents, in a secure and easy to use manner:

-  **Portal:** Talk2Ellaktor
-  **Phone:** +30 210 818 5005 (Mon-Fri 10.00 – 15.00)
-  **Email:** compliance@ellaktor.com
-  **Mail:** ELLAKTOR Group, Ermou St. 25, GR 145 64 Nea Kifissia, Athens- Lamia National Road, Olympic Village Interchange, Greece

▲ **Resources for Support and Guidance**

There are many resources available designed to provide guidance and assist you on any situation that you may encounter while working for ELLAKTOR. Whether you require more information about the Code, or you face an issue that you want to discuss, you can contact any of the following for guidance:

- ▶ Your immediate Supervisor or Management
- ▶ The Compliance Liaison for the Entity or Region
- ▶ The Compliance Officer of the Segment
- ▶ ELLAKTOR Group Compliance Officer

You may also find additional information in ELLAKTOR’s intranet or internet website www.ellaktor.com



**LET US ALL
WORK TOGETHER
IN LIVING OUR CODE
EVERY SINGLE DAY**

Ermou St. 25, GR 145 64, Nea Kifissia
Athens- Lamia National Road, Olympic Village Interchange, Greece

www.ellaktor.com