

TSIMPOS LTD (the “Company”) has adopted this Code of Ethics (the “Code”) for all the Company’s employees, managers and heads (called “Employees”). All Employees are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below in the section entitled “Internal Reporting”.

Field of Application

This Code outlines the ethical principles that are to govern the decisions and behavior of the Company’s Employees and is designed to help Employees conduct business honestly, respectfully and with integrity. This Code outlines the core values of the Company, with respect to how Employees are generally supposed to approach problems. For the avoidance of doubt, this Code does not purport to describe all of the Company’s policies in detail.

Our Company has high expectations from Employees to be familiar and comply with all the provisions of the present Code and cooperate in a transparent and honest way, while encouraging third parties to act in accordance with the core principles of professional and ethical behavior. TSIMPOS LTD is committed to promote the knowledge of the Code of Ethics among Employees, as well as accept their constructive contribution to the present Code’s principles and content for the dissemination of a culture of transparency, honesty, and integrity in all levels. To this extent, the Code of Ethics is brought to the attention of third parties who must accept to comply with the core principle within.

Duties

Every employee of the Company shall respect and duly observe this Code. All employees, regardless of grade and/or position or form of service provided, undertake the responsibility to be always aware of their responsibilities deriving from the present Code, as well as to prevent actions which may not be in line with the Company’s commitments within the context of this Code.

Conflicts of Interest

A conflict of interest occurs when an Employee’s private interests interfere, or even appears to interfere, with the interests of the Company as a whole. Employees must never use or attempt to use their position with the Company to obtain improper personal benefits. Any Employee who is aware of a conflict of interest, or is concerned that a conflict might develop, should discuss the matter with the Administration or General Director immediately.

Employees owe a duty to advance the legitimate interests of the Company when the opportunities to do so arise. Employees may not take for themselves personally opportunities that are discovered using corporate property, information, or position.

Confidentiality and Privacy

It is important that Employees protect the confidentiality of Company information. Employees may have access to proprietary and confidential information concerning the Company’s business, clients, and suppliers. Confidential information includes such items as non-public information concerning the Company’s business, financial results and prospects and potential corporate transactions. Employees are required to keep such information confidential during employment as well as thereafter, and not to use, disclose, or communicate that confidential information other than in the course of employment. The consequences to the Company and the Employee concerned can be severe where there is unauthorized disclosure of any non-public, privileged or proprietary information.

To ensure the confidentiality of any personal information collected and to comply with applicable laws, any Employee in possession of non-public, personal information about the Company’s customers,

potential customers, or Employees, must maintain the highest degree of confidentiality and must not disclose any personal information unless authorization is obtained.

The Company respects and takes seriously the protection of the personal data of all natural persons who use the Company's facilities, services and website. The Company also strives to take all appropriate technical and organizational measures required to protect the personal data it collects and processes.

Honest and Fair Dealing

Employees must endeavor to deal honestly, ethically and fairly with the Company's customers, suppliers, competitors and other Employees. No Employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct is considered to be conduct conforming to accepted professional standards of conduct.

Freedom from discrimination and harassment

Our Company is committed to creating an environment in which all individuals are able to make the best of their skills, free from discrimination or harassment and bullying. The Company is committed to providing a working environment free from discrimination against staff on the basis of sex or sexual orientation, marital or civil partner status, gender reassignment, race (which includes colour, nationality, ethnic or national origin), religion or belief, disability, age and pregnancy or maternity (collectively known as "protected characteristics"), as well as one where harassment and bullying does not occur. It should be noted that all Employees are required to work in a manner that facilitates the fostering of such a working environment and to report any known or suspected breaches or violations as described at the POLICY AGAINST VIOLENCE & HARASSMENT AT WORK, according to the Greek Law 4808/2021. Discrimination, harassment and bullying are violations of the Company's ethical principles and may subject the Company and any Employee guilty of such behaviors to liability, both criminal and civil. Complaints of discrimination, harassment and bullying will be investigated promptly, sensitively and confidentially.

Equality, Diversity and Inclusion

For our Company, diversity, equality and inclusion are a management concept and part of our corporate culture, which aims to contribute significantly to the company's business success through recognition, appreciation, inclusion in the work environment and exploitation the individual diversity of our stakeholders (employees, shareholders, customers, suppliers).

Our Company takes steps to minimize physical barriers within our business model, giving the highest priority to equality criteria, in addition to financial aspects.

Inclusion describes the behavioral pattern through which we consistently ensure the participation of diverse people at work. Unreserved, open interaction with all interested parties is the basic condition for the optimal use of all operational possibilities. As a result, we strive for the well-being of employees and ensure that all views are heard. We also create a culture and work environment in our company where everyone feels they belong and are accepted for who they are.

Health and Safety

The Company provides its Employees with a safe and healthy work environment. Each Employee has the responsibility to maintain a safe and healthy workplace for all Employees by following all applicable safety and health rules, regulations and laws and by reporting accidents, injuries and unsafe equipment, practices or conditions.

Threats or acts of violence and physical intimidation are not permitted.

Drugs and Alcohol

Company prohibits the illegal use, sale, purchase, transfer, possession or consumption of controlled substances, other than medically prescribed drugs, while on the Company premises. Company policy also prohibits the use, sale, purchase, transfer or possession of alcoholic beverages by Employees while on Company premises, except as authorized by the Company. This policy requires the Company to abide by applicable laws and regulations relative to the use of alcohol or other controlled substances.

Environmental Compliance

All Employees hereby agree to comply with the Company's policy for environmental compliance and to work towards achieving continual environmental protection improvement. No violation of prevailing local or national environmental rules, regulations or laws whatsoever is to the benefit of the Company and therefore the Company has zero tolerance against any such violations.

Anti-corruption, Gifts and Hospitality

The Company is committed to complying with all applicable anti-corruption laws, to denying any form of bribery and to conducting its business in an ethical, fair and transparent manner.

It is strictly prohibited for Employees to offer to pay, pay, authorize payment or promise to pay money or anything of value, directly or indirectly, to a government official, an existing or potential business partner or any other party, when such payment is intended to influence latter's act or decision, to award or retain business, or to induce or reward unethical or illegal behavior or a breach of duty.

Employees are not to request, receive, solicit, agree to receive, directly or indirectly, money or anything of value that may reasonably be regarded as a bribe or as an improper incentive for the Company's business activities.

Gifts and hospitality must never be offered or provided with a purpose of trying to improperly influence business conduct.

Child labour

The labour standards are based on the convention of the international Labour Organization (ILO) and the Universal Declaration on human rights. The Company respects the regulations of the United Nations on human rights and children's rights. In particular, the Company commits to comply with the minimum age for admission to as well as the prohibition and immediate action of elimination of the worst forms of child labour. Children and young persons under 18 shall not be employed at the Company.

Protection and Proper Use of Company Assets

The Company's assets are only to be used for legitimate business purposes and only by authorized Employees. This applies to tangible assets (such as office equipment, telephone, copy machines, etc.) and intangible assets (such as trade secrets and confidential information). Employees have a responsibility to protect the Company's assets from theft and loss and to ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. If you become aware of theft, waste or misuse of the Company's assets you should report this to your manager.

Compliance with Laws, Rules and Regulations

It is the Company's policy to comply with all applicable laws, rules and regulations. It is the personal responsibility of each Employee to adhere to the standards and restrictions imposed by those laws, rules and regulations, and in particular, those relating to accounting and auditing matters.

Any Employee who is unsure whether a situation violates any applicable law, rule, regulation or Company policy should contact the Company's Administration.

Corporate Communications Policy

Only certain designated Employees may discuss the Company with the news media, analysts and investors. All inquiries from regulatory authorities or government representatives should be referred to the appropriate designated Employee. Employees exposed to media contact during their course of employment must not comment on rumors or speculation regarding the Company's activities.

Electronic Communication

"Electronic communications" include all aspects of voice, video, and data communications, such as voice mail, e-mail, fax, and Internet. Employees should use electronic communications for business purposes and refrain from personal use while on Company premises or when performing Company duties. Among other things, Employees should not participate in any online forum where the business of the Company or its customers or suppliers is discussed; such participation may give rise to a violation of the Company's confidentiality policy. The Company reserves the right to inspect all electronic communications involving the use of the Company's equipment, software, systems, or other facilities ("Systems") within the confines of applicable local law and Employees should not have an expectation of privacy when using Company Systems.

Internal Reporting

Any violation, suspected or known, of the Code of Ethics, must be immediately notified to the Company through the following communication channels:

- e-mail box: post@gre.tsimpos-ltd.com

- post office: 55, Ethnikis Antistaseos Str., Chalandri, 152 31 - Greece, TEL. +30 210 6746519.