



Code of Ethics and Professional Conduct

THEODOROU AUTOMATION SAICT

Preface

This Code of Ethics and Professional Conduct is a collection of all the commitments the Management has undertaken towards the employees, as well as the professional conduct required from all employees of THEODOROU AUTOMATION SAICT.

The Code was drafted on the basis of the Company's business activity, the relevant legal framework and the standards of professional conduct necessary for the pursuit of the Company's business activity.

The Code determines the daily operations and conduct of the employees. In addition, it constitutes a manual of rules of acceptable conduct between employees, as well as between employees and third parties, namely any natural or legal person governed by private or public law in Greece or abroad, and it is binding for all employees regardless of their rank in the company hierarchy.

The Code is addressed to and binding for all current and future employees of the Company.

Table of Contents

Aim of the Code	4
Our Business Partners	5
Environmental Responsibility	6
Responsibility for our Products	7
Employees	8
Professional Conduct.....	9
Scope of the Code	10

Aim of the Code

The Code of Ethics and Professional Conduct has been designed to help solve issues that we may have to deal with on our daily work. How should we handle client or supplier requests? How should we treat our colleagues? How should we deal with internal issues that may come up?

However, it is not possible to foresee every situation that may arise. If you are dealing with an issue related to ethics or professional conduct, please ask yourself the following questions:

- Is it legal?
- Does it comply with the Code of Ethics and Professional Conduct of the Company?
- Am I certain that I am using appropriate conduct?
- Does it feel that I am making the right decision?
- What will other people think if this goes public?

In case of doubt, you must express your concerns to your supervisor and ask for advice.

Our fundamental principle is to abide by the law

It is a fundamental principle of the Management and all of the Company's employees to abide by and observe the law in every country THEODOROU AUTOMATION is active.

Our Business Partners

THEODOROU AUTOMATION wishes to form a long-lasting cooperation with clients and suppliers, based on honesty, trust and mutual interest. We respect the tangible and intangible property rights of our business partners, regarding anything they entrust with us. We safeguard the confidentiality of information revealed to us. We handle the personal information of our business partners with responsibility and according to the law on the protection of personal data.

Responsibility towards our clients

THEODOROU AUTOMATION treats all clients, regardless of their size, with responsibility, honesty and impartiality. We are committed to marketing our products and services in an honourable and fair manner. We ensure the accuracy and credibility of our statements, on a mass communication level, as well as on a personal contact level with our business partners.

Integrity towards our suppliers

The Company provides equal opportunities to all potential suppliers, without bias. We select our suppliers using objective criteria, such as the quality of their products and services, aftersales technical support, speed of delivery, pricing policy, financial solvency, as well as experience and know-how. We encourage our suppliers to share our commitments regarding the work environment and respect for the environment.

Competition and antitrust policy

The Company and all its employees abide by the laws in force regarding fair competition and antitrust. We are highly interested in promoting free, fair, lawful and open competition in the market, avoiding unfair cooperation and any actions that could limit free competition. We must refrain from any relationship with competitors, which could be characterised as an illegal agreement or arrangement. Activities and actions such as the following are forbidden: agreements aiming to define prices or trading conditions, client or market segregation, agreements on production or sales control, unfair practices, agreements or arrangements to cut off competitors from the market or to limit market access for new competitors using unfair means.

Gift policy

The value of gifts offered must fall within reasonable boundaries, as defined by the applicable laws and common business practices. We do not accept any gifts that could affect or could be considered as aiming to affect our judgement. We never accept cash as a gift. The value of any gifts offered or accepted must comply with the above principles.

Environmental Responsibility

THEODOROU AUTOMATION has adopted practices which aim at minimizing the environmental effects of its activities.

Environmentally friendly processes

Regardless of the area of operation, we struggle to reduce the environmental effect of our activities by taking measures for the prevention of danger and accidents, controlling energy consumption and applying appropriate waste management.

Each one of us is expected to contribute individually, according to his/her position in the Company, by doing the following:

- Using non-toxic raw materials to minimize the environmental effects of our products
- Carefully selecting suppliers and machinery taking into account, among other things, whether they are environmentally friendly
- Recycling materials used in the production process
- Avoiding the use of dangerous materials and safely removing all non-conforming materials
- Minimizing energy consumption in the production process
- Avoiding pollution and contamination of the local environment – using biodegradable chemicals whenever possible
- Constantly monitoring the production processes and waste levels, and controlling their environmental effect
- Reducing energy consumption at the Company's facilities
- Making optimum use of group packages shipped to clients
- Trying to gather orders made by the same client into a single shipment
- Using recyclable and light materials in product packaging.

Responsibility for our Products

The trust our clients show in us derives mainly from the high quality, safe products we offer. We must all contribute to that. Depending on our area of activity, we should ensure the following:

- Product compliance to the regulatory standards
- Strict implementation of quality controls at every production stage and an effort for constant improvement of product quality
- Prevention of accidents through proper technical documentation, as well as installation and safety instructions
- Handling any safety or quality issues reported by our clients.

What our products have to offer to clients

We cooperate closely with our clients in order to develop end of production and packaging line solutions, which create great added value, since they offer benefits such as:

- Compliance to legislation on product safety and traceability
- Reduced production cost through automation
- Meeting any requirements of the domestic and international clientele of our clients regarding labelling and product safety
- Reduced handwritten documents and prevention of human error
- Improvement of product safety and quality, as well as of the production and supply chain processes

Employees

Understanding the importance of the work environment to the Company's sustainable development, the Management of THEODOROU AUTOMATION has developed a corporate social responsibility on the following levels:

- Constant training of the technical and commercial department personnel, regarding product and customer service issues
- Making sure that any decisions regarding hiring, remuneration, promotions and safety at work are taken on the basis of abilities, skills and performance
- Equal opportunities for internal professional development, through a structured evaluation system
- Life-work balance, achieved through flexible working hours, additional facilitations for employees in a sensitive situation (pregnancy, illness of a family member, etc.) and benefits (mobile phone, car, laptop computer, etc.).
- Active participation in the decision making process, through meetings with all parties involved and a system for the submission and promotion of new ideas by all employees, regardless of their rank in the company hierarchy
- Constant improvement of working conditions for employees through the application of new technologies that help automate their work

Furthermore, there shall be no discrimination on the basis of nationality, skin colour, religion, sex, age, ethnicity, sexual orientation, family situation, physical disability, political or philosophical views or participation in unions.

Prohibition of child labour

THEODOROU AUTOMATION does not accept child labour nor support its use under any circumstances. Child labour is prohibited, as defined by the relevant Conventions of the International Labour Organisation and the United Nations, as well as the national law.

Health and safety

THEODOROU AUTOMATION seeks to secure a safe work environment that puts no one into danger. Particular attention is paid to personnel safety during work at the company labs, as well as at the client's premises.

We must all conform to hygiene, health and safety rules, and help our colleagues do the same. We must be careful with safety matters and make sure that our actions do not put ourselves or anyone else in danger.

Professional Conduct

All employees must fulfil their duties and guard the Company's interests using lawful means. Therefore, they must avoid getting involved in activities in which their private interests conflict those of the Company.

Conflict of interest

Conflict of interest can take many forms, such as cooperation, employment, ownership or any other financial relation with a competitor, a supplier or a client of the Company, making profit from the Company's business, use of materials, products, systems and any other of the Company's assets for non-approved usage and personal gain, acceptance of gifts, money or other benefits of high value from a client, competitor or supplier, without prior knowledge thereof and approval by the Management, selection of a partner or supplier on the basis of an agreement or personal financial gain, representation, use and exploitation of the Company's name without the Management's consent, any kind of investment in or financing of competitive companies, clients or suppliers, acceptance of benefits and facilities by external parties or the Company itself without prior knowledge of the Management. All employees must inform their supervisors about any situation that could constitute conflict of interest and get their approval.

Protection of company property

It must be ensured that company assets and potential are not wasted or embezzled by the employees. Assets include work time, intangible assets and confidential information. Any equipment, information, ideas and data you use or you have access to while performing your duties, are company property. Company resources are to be used only for business. The same applies to any power granted to you as part of your duties.

Confidential information

Valuable company assets, such as strategic plans, intellectual property, know-how, financial, technical and commercial information, as well as any confidential information must not be made public without prior approval. All confidential files, especially information about clients and suppliers (e.g. data bases), must be kept at a safe place and employees are to return them to the Company when they leave.

Intellectual property

The Company respects the intellectual property and protected information of third parties. Confidential information that belongs to a third party may be used only after an agreement approved by the legal department. Installation of non-authentic and unapproved software to company computers is prohibited.

Scope of the Code

All members of the staff must conform to and implement the principles included in the Code, according to their duties and responsibilities. All employees must carefully read and follow the Code.

In case of doubt or uncertainty about any clause of the Code, you may consult with your supervisor.



Theodorou Automation SAICT

17, Ag. Athanasiou Str

19002 Peania

Greece

Tel: 0030 210 6690900

Fax: 0030 2106640200

marketing@theodorou.gr

www.theodorou.gr