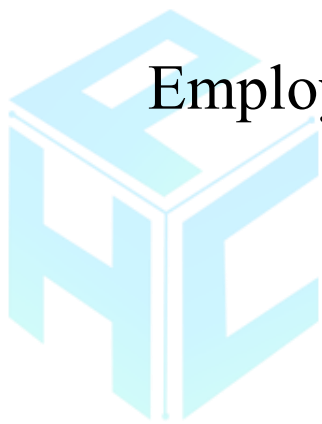




HELLENIC
PHARMACEUTICALS
CORPORATION

HELLENIC PHARMACEUTICALS CORPORATION SA



Employee Code of Conduct

v.4, 2026

HELLENIC
PHARMACEUTICALS
CORPORATION

1. Introduction

Purpose

The Employee Code of Conduct establishes the standards of behavior and ethical expectations for all employees at **HPC SA**. This code is designed to ensure that every employee conducts themselves in a manner that reflects the organization's values and principles while promoting a respectful, productive, and legally compliant work environment.

Scope

This policy applies to all employees, contractors, interns, and anyone else performing work for **HPC SA**. It covers professional conduct, ethical standards, and responsibilities both within the workplace and during external activities that represent the organization.

Authority

The responsible person for all matters contained within this document is Klevis Miska and he is the first point of contact for complaints, clarifications and elaborations

2. Professional Conduct and Behavior

General Conduct

Employees are expected to perform their duties responsibly, ethically, and in line with the organization's policies. Professional behavior should be demonstrated in all interactions with colleagues, clients, and external partners.

Respect in the Workplace

All employees must:

- Treat colleagues, customers, and stakeholders with dignity and respect.
- Refrain from any behavior that could be perceived as bullying, harassment, or discrimination.
- Foster a positive and inclusive working environment by promoting teamwork and cooperation.

Dress Code and Appearance

Employees should maintain a professional appearance appropriate to their role and the nature of their work. While specific dress codes may vary depending on department or occasion, employees are generally expected to present themselves in a neat, clean, and professional manner.

3. Ethical Standards

Integrity and Honesty

Employees are expected to act with integrity and honesty in all aspects of their work. This includes:

- Providing truthful and accurate information in all reports, communications, and representations.
- Refraining from fraudulent behavior, including falsifying records, misreporting work hours, or misusing company resources.

Conflicts of Interest

Employees must avoid situations where personal interests conflict, or appear to conflict, with their responsibilities to the organization. Examples of conflicts of interest include:

- Engaging in outside employment or business that competes with the organization.
- Using the organization's resources or confidential information for personal gain.
- Accepting gifts or favors that may influence business decisions. If a conflict of interest arises, employees must disclose it to their supervisor or the HR department.

Confidentiality

Employees must protect the confidentiality of sensitive or proprietary information belonging to the organization, its clients, or its partners. This includes:

- Not sharing confidential information with unauthorized persons.
- Using secure methods to store and transmit sensitive data.
- Respecting client privacy and ensuring compliance with Greek data protection laws (e.g., GDPR, HIPAA). Breaches of confidentiality may result in disciplinary action.

4. Use of Company Resources

Appropriate Use

Employees must use the organization's resources, including physical equipment, technology, and funds, responsibly and for work-related purposes only. This includes:

- **IT and Communication Systems:** Company computers, phones, email, and internet access must be used for legitimate work activities. Personal use of these resources should be minimal and must not interfere with work duties.
- **Office Equipment and Supplies:** Office supplies, vehicles, and equipment must be used responsibly. Employees are expected to avoid waste or damage to company property.

Personal Use

Employees should limit personal use of company resources. Excessive or unauthorized personal use may result in disciplinary action. For example:

- Personal calls or internet use during work hours should be limited.
- Employees are prohibited from downloading illegal software or accessing inappropriate content via company systems.

5. Anti-Discrimination and Harassment

HPC SA is committed to fostering a workplace that is free from discrimination and harassment. Employees must:

- Comply with the organization's Anti-Discrimination and Harassment Policy.
- Treat all colleagues equally, regardless of race, gender, age, religion, disability, or any other protected characteristic.
- Report any incidents of harassment, bullying, or discrimination to their supervisor or HR.

Reporting Harassment

If an employee experiences or witnesses harassment, they should report it immediately through the established grievance channels. The organization will investigate and take appropriate corrective action.

6. Compliance with Laws and Regulations

Legal Compliance

Employees are required to comply with all applicable local, National & European laws, as well as industry regulations relevant to the organization's operations. This includes:

- Following health and safety regulations.
- Adhering to anti-corruption and anti-bribery laws.
- Ensuring all business practices are fair, transparent, and legally sound.

Anti-Bribery and Corruption

Employees must not engage in bribery or corrupt practices in any form. This includes:

- Offering, giving, soliciting, or receiving any form of bribe or kickback.
- Failing to report suspicious behavior that may involve bribery or corruption.

7. Attendance and Punctuality

Attendance Expectations

Employees are expected to maintain regular attendance and report to work on time. Absenteeism or tardiness without valid cause disrupts the work environment and may lead to disciplinary action.

Leave of Absence

Employees should request leave in accordance with the company's Leave Policy and give advance notice for planned absences. Unscheduled absences due to illness or emergencies should be reported as soon as possible to the employee's manager.

8. Health and Safety

Workplace Safety

Employees are responsible for maintaining a safe work environment by:

- Adhering to health and safety protocols, such as using protective equipment where necessary.
- Reporting unsafe conditions or hazards to the safety officer or management.

- Complying with emergency procedures, including evacuation plans.

Drug and Alcohol Use

HPC SA has a zero-tolerance policy for drug and alcohol use in the workplace. Employees are prohibited from:

- Reporting to work under the influence of drugs or alcohol.
- Using, possessing, or distributing illegal substances on company property. Violations of this policy may lead to immediate termination.

9. Social Media and Communication

Responsible Use of Social Media

Employees must use social media responsibly and ensure that their personal posts do not harm the reputation of the organization. Guidelines include:

- Avoid posting defamatory or discriminatory content related to colleagues, clients, or the organization.
- Refrain from sharing confidential information online.
- Clearly distinguish between personal views and the views of the organization when discussing work-related topics.

Professional Communication

Employees are expected to communicate in a professional and courteous manner at all times. This includes:

- Avoiding aggressive, inappropriate, or offensive language in all forms of communication (emails, calls, meetings).
- Being mindful of tone when communicating with clients, colleagues, and stakeholders.

10. Disciplinary Action

Violations of Code

Any violation of this Code of Conduct may result in disciplinary action, which may range from a verbal or written warning to suspension or termination, depending on the severity of the violation.

Investigation Process

The organization will conduct a thorough investigation of any reported violations. Employees will be given an opportunity to explain their actions before any disciplinary decisions are made.

Reporting Violations

Employees are encouraged to report any breaches of this Code of Conduct to their supervisor or the HR department. The organization will investigate and take appropriate action while maintaining confidentiality and protecting whistleblowers from retaliation.

11. Amendments and Review

This Code of Conduct will be reviewed periodically and may be amended as needed to reflect changes in the law or organizational policies. Employees will be notified of any updates, and adherence to the revised code is mandatory.

Conclusion

This Employee Code of Conduct outlines the ethical and professional standards expected from all employees of **HPC SA**. By adhering to these principles, we can foster a positive, respectful, and productive work environment that benefits both the organization and its employees.

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