



# Code of Ethics & Conduct

October, 2025

2nd Revision, approved by the Board of Directors on 31/10/2025

## Table of Contents

<b>Introduction</b> .....	3
<b>I. Scope</b> .....	3
<b>II. Fundamental Principles, Values &amp; Policies</b> .....	3
<b>A. Principles</b> .....	3
1. Respect for Human Rights .....	3
2. Integrity.....	3
3. Transparency and Accountability.....	4
4. Meritocracy.....	4
5. Safe Working Environment.....	4
6. Non-discrimination - Impartiality.....	4
7. Anti-Money Laundering .....	4
<b>B. Values</b> .....	5
1. Reliability.....	5
2. Flexibility .....	5
3. Team Spirit .....	5
4. Social Responsibility .....	5
5. Technological Leadership and Innovation.....	5
<b>C. Policies</b> .....	6
1. Sustainable Development .....	6
2. Anti-Bribery and Anti-Corruption .....	6
3. Prevention of Violence and Harassment.....	6
4. Conflict of Interest Policy .....	6
5. Protection of Personal Data - Confidential Information .....	6
6. Reporting of Violations of EU Law - Whistleblowing.....	7
7. Corporate Governance and Regulatory Compliance .....	7
<b>III. Implementation, Monitoring &amp; Amendment of the Code</b> .....	7

## **Introduction**

The Company's Code of Ethics and Conduct reflects the fundamental principles, rules, and values that establish the framework of corporate activities and guide our behavior and practices daily. These rules and principles define the conduct we expect from all members of our workforce, and how the Company engages and collaborates with customers, suppliers, consultants, and other stakeholders.

ThPA S.A. (the “Company”) is committed to upholding the principles set forth in this Code, which serve as fundamental guidelines for every aspect of its activities. It is emphasized that the process of achieving business results is equally important as the results themselves. The adoption, consistent application, and adherence to high standards of conduct constitute a cornerstone of the Company’s corporate identity and operations.

## **I. Scope**

The Code of Ethics and Conduct, along with the related policies, regulations, and procedures, applies to all Company personnel, regardless of hierarchical level, position, employment status or type, or area of work. It also applies to third parties entrusted with duties equivalent to those of Company personnel. Additionally, the Company expects all its external partners — including contractors, suppliers, consultants, customers, users, and other business associates — to respect and adhere to the principles and values set forth in this Code. Adherence to the values, principles, and rules of the Code is a collective obligation and shared responsibility binding on all individuals employed by or collaborating with the Company.

## **II. Fundamental Principles, Values & Policies**

### **A. Principles**

#### **1. Respect for Human Rights**

We acknowledge that the protection of human rights is fundamental to the ethical and responsible operation of the Company. We are committed to adhering to the principles and standards established by international organizations and relevant international conventions.

#### **2. Integrity**

We act with honesty, sincerity, a sense of justice and responsibility, ensuring transparency so that together we advance toward success in the most proper way. We respect the laws and regulatory framework of the country, as well as international commitments and corporate responsibility initiatives.

ThPA S.A. neither engages in nor permits any behavior, action, or transaction that could possibly damage its credibility, reputation, or integrity.

### **3. Transparency and Accountability**

We act with transparency, responsibility, and open communication, ensuring that all interested parties are kept informed. We aim to build and strengthen trust with our employees, customers, suppliers, and social partners. All personnel are required to conduct transactions impartially, behave with objectivity, and always adhere to fair competition rules, taking full responsibility for their decisions and actions. The misuse of privileged information, the provision of false or inaccurate information, or any other unfair practice or behavior is strictly prohibited.

### **4. Meritocracy**

Taking into account the education, qualifications, experience, and skills of our employees, we assign them tasks that align with their capabilities, enabling them to perform at their highest potential and fostering their professional development.

### **5. Safe Working Environment**

Protecting the health and safety at work, and fostering a healthy and secure workplace, are key priorities for ThPA S.A. Management is committed to providing safe and hygienic working conditions, aiming to prevent workplace accidents and occupational diseases. Concurrently, we strive for the continuous improvement of our Occupational Health and Safety Management System. All personnel are required to strictly adhere to regulations, procedures, and guidelines concerning health and safety in the workplace.

### **6. Non-discrimination - Impartiality**

ThPA S.A. operates by recognizing the value of each person as a unique individual and a member of society, regardless of age, race, gender, color, ethnicity, religion, health, sexual orientation, political or ideological beliefs or other characteristics. All personnel are required to comply with applicable laws and regulations and to perform their duties with respect for the principle of non-discrimination. Any preferential treatment based on familial relationships or personal favoritism is strictly prohibited.

In addition, ThPA S.A. is committed to supporting and facilitating the professional integration of individuals belonging to vulnerable professional groups.

### **7. Anti-Money Laundering**

ThPA S.A. operates in full compliance with the applicable institutional framework against money laundering and the relevant provisions issued by the competent authorities. Due diligence procedures are applied to customers, suppliers, and external partners in order to verify their reliability and the legality of their activities.

## **B. Values**

### **1. Reliability**

We are committed to delivering optimal service to all stakeholders—partners, suppliers, employees, government bodies, professional associations, society, the environment etc.). We ensure that all our actions are planned, measured, and controlled according to the highest standards. This approach consistently guides us in providing reliable and high-quality services, creating value at every stage of our operations.

### **2. Flexibility**

We actively monitor changes in our environment and stay informed about developments in our industry, continuously adapting our communication and approach, in order to find the most suitable solutions.

### **3. Team Spirit**

At ThPA S.A., we are a dynamic team that, guided by shared principles and values, is committed to providing the best possible service to our partners while ensuring that our activities leave a positive footprint on society and on the environment in which we operate. The success of the Company is inextricably linked to the success of each member of our team. We offer a creative, safe, collaborative, and productive work environment, promoting equal opportunities and systematically investing in the further development of the talents and skills of our employees.

### **4. Social Responsibility**

We actively participate in targeted actions that contribute to and promote the societal well-being, while enhancing entrepreneurship and quality of life. We show care and respect for the environment, with a human-centered approach. We set high standards of health, safety, and environmental awareness, encouraging our economic and social partners to adopt similar practices.

### **5. Technological Leadership and Innovation**

At ThPA S.A., we leverage our technical expertise to stand out. We operate with methodical precision and dedication, adhering to all regulations. Our focus is on technological specialization, aiming to consistently achieve high-quality results and value-added solutions. We create an environment of continuous learning and invest in modern technologies, equipment, and know-how promoting innovative ideas and actively seeking to upgrade processes and systems. Through automation and digitization of port systems, we optimize operations, procedures, and infrastructure, delivering high-tech services that create value for both the Company and the broader port community.

## **C. Policies**

### **1. Sustainable Development**

The Company is committed to operating with a focus on sustainable development, integrating responsible management of natural resources, environmental protection, and the promotion of social and economic progress into its business activities. A key pillar of ThPA S.A.'s corporate culture for its smooth and successful operation is the integration of sustainable development practices across all its activities and operations. ThPA S.A. undertakes initiatives aimed at reducing any environmental footprint by implementing a comprehensive sustainable development strategy. These actions extend to the protection of the marine environment and biodiversity, contributing to the creation of a sustainable urban environment.

### **2. Anti-Bribery and Anti-Corruption**

ThPA S.A. has a zero-tolerance policy on bribery and corruption, and is committed to operating in a lawful, ethical, and transparent manner. In this context, it has established and implemented a comprehensive Anti-Bribery Management System in accordance with International Standards.

This System aims to prevent, deter, and combat incidents of bribery through compliance with Greek and European legislation, assessing relevant risks, providing ongoing staff training, and encouraging confidential reporting of possible violations.

### **3. Prevention of Violence and Harassment**

ThPA S.A. is committed to maintaining a work environment free from violence, harassment, intimidation, and discrimination, and declares zero tolerance for any such behavior by employees at all levels, visitors, and associates.

### **4. Conflict of Interest Policy**

A conflict of interest is defined as a situation in which individuals holding administrative, managerial, executive, or supervisory responsibilities in the Company have personal interests that could unfairly influence the fulfillment of their obligations and the exercise of their duties and responsibilities arising from their position and role in the Company.

In compliance with the obligations imposed by national and European legislation, ThPA S.A. has adopted a policy and procedures for the prevention and management of situations involving conflicts of interest.

### **5. Protection of Personal Data - Confidential Information**

ThPA S.A. applies stringent security measures and conducts regular audits to protect personal data from any intentional or unintentional attempts at manipulation, loss, destruction, or, more generally, unauthorized access. These security measures are continuously reviewed and upgraded in line with the most recent technological developments.

The Company's assets that require protection include confidential corporate information, such as, indicatively, intellectual property, trade secrets, patents, trademarks, copyrights, as well as business, operating and strategic plans, marketing and service provision plans, databases, files, payroll data, and in general any unpublished financial data and reports. Unauthorized use, dissemination, or exploitation of this information constitutes a violation of company policy and may result in civil or criminal penalties.

### **6. Reporting of Violations of EU Law - Whistleblowing**

ThPA S.A. provides the option for anonymous reporting of violations related to irregularities, omissions, or offenses that have come to the attention of its employees, customers, suppliers, or any other interested party. A prerequisite is that such information is provided in good faith, meaning there must be reasonable grounds to believe that the reported information is true.

### **7. Corporate Governance and Regulatory Compliance**

ThPA S.A. operates in accordance with the applicable provisions of Greek and European legislation, international law regulations, and relevant standards and principles. Every activity, decision, or transaction is carried out in compliance with the institutional framework, the guidelines of the competent regulatory authorities, and the principles of good governance. All employees, regardless of rank, as well as other individuals acting on behalf of or in connection with ThPA S.A., are expected to fully comply with the applicable legal and regulatory framework and to observe the restrictions imposed by the legislation and the regulatory framework.

## **III. Implementation, Monitoring & Amendment of the Code**

The Code is a document of fundamental importance for ThPA S.A. The application of its principles is an obligation for all of us, because it safeguards the interests of the personnel, Management, Shareholders, and the wider community. Furthermore, it contributes to the smooth operation of ThPA S.A., while enhancing its credibility and good reputation.

The Code of Ethics and Conduct, along with any amendments, is approved by the Board of Directors of ThPA S.A. and is made accessible to all through the Company's website.