



CODE OF CONDUCT

We, the company VENUS GROWERS, have as a basic principle to create long-term partnerships with our employees, partners, customers and suppliers, to be sustainable and ultimately to create value for society. We want to offer our customers and consumers healthy, nutritious, safe and high quality products, while applying: good practices in terms of human rights, without any discrimination, without child labor, without compulsory and forced labor, trade union rights, no corruption and anti-competitive behavior as defined by the United Nations Global Compact (UNGC) and the International Covenant Labour Organization (ILO). We act with integrity, dedication, honesty, and in full compliance with all applicable laws.

This Code of Conduct is addressed to all those who work or collaborate with the company. In addition to the Company's employees, we also urge our suppliers to comply with the Code of Conduct to the extent that it concerns them.

The governing principles of the Company in the axis of relations with its employees are those of trust, respect and the establishment of open dialogue and communication. Within organizational boundaries, every employee treats their colleagues with the utmost respect and dignity. Company's' priority is to establish and maintain successful employment relationships. The same principles govern the relations between superiors and subordinates. Both are equally responsible for ensuring open and honest communication with each other. The Company's employees must not put their personal interest above the corporate interest and are obliged to comply with the applicable national legislation.

CONSUMER HEALTH AND NUTRITION

Our goal is to enrich the quality of life of consumers by offering them healthy, nutritious and tasty food choices. Therefore, we use healthy ingredients and avoid unnecessary use of additives. We have incorporated the latest scientific evidence, technology and trends in food safety and direct our actions to scientifically support health claims. When communicating about the promotion of our products, we present them in a way that we do not deceive the consumer and do not encourage overconsumption.

QUALITY ASSURANCE & PRODUCT SAFETY

Our commitment is to comply with all internal and external requirements for food safety, legislation and quality requirements. We never compromise on the quality of our products, thus assuring the customer and the consumer that they are getting a safe and high-quality product. The quality policies and quality assurance systems we follow are designed to guide and control the activities and the production process throughout the production process "from the field to the fork", continuously ensuring that the products we offer are tasty, nutritious, healthy and safe.

BRIBERY AND CORRUPTION

All the Company's transactions are carried out in a legal and ethical manner and are harmonized with the applicable national and EU legislation and the principles of the United



Nations Global Compact (UNGC). Both the management and the employees of the Company are prohibited from offering, providing, accepting or promising, directly or indirectly, any undue financial or other benefit to a public and/or private employee, with the aim of obtaining favorable treatment or business advantage. In addition, it is forbidden to offer, urge to accept or accept gifts and donations, in any financial or material form and to provide in general any benefit related to the performance of the duties of the Company's employees. The employee or associate who commits the offense of bribery in the exercise of his duties may be charged with civil and criminal liability in accordance with the applicable legislation, while his employment relationship with the Company will be terminated.

Exceptions

- *Donations and sponsorships of a charitable/social solidarity nature.*

In the context of social responsibility actions, the Company may support charitable organizations or sponsor sports, cultural or educational events or actions. However, in all cases, it should be ensured that contributions and sponsorships of a charitable and social nature will preferably be offered to recognized organizations and in any case after relevant research and evaluation, without any expectation of obtaining a business advantage or other preferential treatment in return and will be accompanied by legal documents.

- *Gifts of non-significant value*

Gifts of non-significant value, which fall within the framework of normal business practice (e.g. office supplies with a company logo, calendars) and symbolic gifts due to name or religious holidays or other circumstances that are considered acceptable and offered in the context of social communication are allowed. Where such gifts are received, they must be duly disclosed.

In any case, the offer or acceptance of a gift in the form of money, regardless of the amount, is expressly prohibited.

NON-COMPETITIVE BEHAVIOR

We believe in an open and competitive market and adhere to the free-market principle while not contributing to restrictive practices or abuses of dominant positions. In fact, we will not participate in cartels, price formation agreements, agreed market placeholder allocations or unapproved mergers/acquisitions. We recognize that in addition to national laws and regulations, supranational guidelines (EU, ICN, OECD, WTO) are also considered.

HEALTH AND SAFETY AT WORK

The protection of the health and safety of all employees or associates of the Company in all workplaces is a top priority. In this context, the Company complies with the applicable legislation for the protection and safety of employees and with hygiene rules. Employees, partners and all visitors of the Company must respect and comply with the health and safety policies and standards applied in the Company. These include not only the mandatory legal requirements but also the best practices of the industry to which the Company belongs and ensure that the Company provides a healthy and safe environment for both employees/partners and visitors.



The active elimination of accidents, injuries and illnesses is a priority of the Company. By accepting mutual responsibility for safe work, the Company continues the effort to minimize injuries and illnesses with the goal of zero incidents, thus contributing to the well-being among employees and the success of the Company.

Employees (permanent and seasonal) receive training on health and safety issues. Permanent workers are retrained at least on an annual basis, while training is repeated for new (permanent and seasonal) or rehired seasonal workers on the day of their recruitment.

All employees/partners are provided with access to clean toilet facilities, drinking water and, if necessary, clean facilities for food storage.

The Company does not provide housing for its employees. If this possibility arises, it is committed to being clean, safe, and meeting the basic needs of employees.

The Company has delegated responsibility for health and safety to a senior management representative.

HUMAN RIGHTS/ HUMAN RIGHTS AND LABOUR

In the context of ensuring human rights and ensuring a healthy and safe working environment, Venus Growers is guided by the principles of the United Nations Global Compact on Human Rights and Labor and aims to be a model for human rights and labor practices in all its business activities. Venus Growers relies mainly on the principles of the ILO for all matters related to labor.

– The Company treats every employee with respect and ensures a healthy working environment, in which everyone is accurately informed about their duties and obligations, while at the same time supporting the development of skills.

– The Company selects, hires and compensates all its employees and partners based on their qualifications and abilities, the type and quality of the work to be carried out. In no case does it adopt criteria relating to race, religion, nationality, colour, sex, age, citizenship, sexual preference, marital status, physical or mental disability, political opinion or any other characteristics. The Company favors diversity and equality as fundamental rights of employees. (Equal Opportunities/Anti-Discrimination Policy)

– The Company does not employ minors (children and young people under the age of 18).

We support full compliance with the minimum age for assignment of work as proposed by the International Labour Organisations, which is not before the compulsory education and not less than 15 years old, except in cases where some ILO exceptions fall (clear national laws of developing countries, light work, activities referred to in specific ILO conventions). We completely reject the types of work that are classified as "the worst forms of child labour" by the ILO. (UNGC 5, ILO C138, ILO C182.

Company is willing to develop or participate in and contribute to policies and programs that promote the transition of every child who finds himself performing child labor to quality education until he or she is no longer a child.

We advocate that children and young people under the age of 18 should not be occupied at night or in dangerous conditions.

– The Company condemns all forms of forced and compulsory labor, for example, where employees are forced to work with severe deprivation, physical violence or sexual



exploitation, or to limit people's actions (**FORCED & COMPULSORY LABOR – MODERN WORK**). Employees are not obliged to submit "monetary guarantees" or their identity documents to their employer and are free to leave their employer after reasonable notice. The employment relationship should be chosen freely and without threats. The Company provides training to executives in the procurement, sales, quality assurance and personnel departments to be able to recognize the signs of forced and compulsory labor. The principle of the company is that **THE EMPLOYMENT RELATIONSHIP IS CHOSEN FREELY AND WITHOUT THREATS (UNGC 4, ILO C29, ILO C105)**.

– The Company recognizes and respects the right of association and the right to collective bargaining. It recognizes and respects the right to trade unionism and collective bargaining in accordance with the relevant applicable national laws. Employees are able to join unions of their choice without fear of intimidation, retaliation or discrimination in accordance with national law. (UNGC 3). Workers, without any discrimination, have the right to trade unionism and collective bargaining in unions of their choice. The Company adopts an open attitude towards the activities of the trade unions and their organizational activities. Workers' representatives are non-discriminatory and have access to perform representative duties in the workplace. If the right to freedom of association and collective bargaining is limited in accordance with the law, the Company facilitates and does not impede the development of parallel instruments for independent and free association and negotiation.

– The Company pays salaries and benefits that are at least in line with the applicable national legislation or the applicable standards in the industry, whichever is more favorable to the employee. In any case, the employee's remuneration must be sufficient to cover the basic living needs. All employees are provided with written and comprehensible information about their payroll before the start of the employment relationship and a clear timetable for the payment of the salary.

– Working hours comply with national legislation, collective agreements where they exist and international labour standards. Working hours, excluding overtime, are fixed by contract, and do not exceed 48 hours per week (International standards recommend the gradual reduction of normal working hours, where appropriate, to 40 hours per week, without a corresponding reduction in workers' wages.) Overtime is voluntary. Overtime is used responsibly, considering all of the following: the extent, frequency and hours worked by individual employees and the workforce as a whole. It is not used to replace regular employment. Overtime should always be compensated for extra monetary remuneration, and it is recommended that it be not less than 125% of the normal remuneration. Working hours may exceed 60 hours, for each 7-day period only in exceptional cases, provided that all of the following are met:

- This is permitted by national law.
- This is allowed by a collective agreement of free negotiation with an organization of workers representing a significant part of the workforce.
- Appropriate safeguards should be adopted to protect the health and safety of workers.
- The employer can demonstrate that these are exceptional circumstances such as an unexpected production spike, accidents or emergencies.

Workers shall be granted at least one day off in each 7-day period or, where permitted by national law, 2 days in each 14-day period.



– The Company provides regular employment to the extent possible. The work performed is recognized based on the employment relationship, as determined by the applicable national legislation. The Company's obligations towards employees in the context of work or social security laws and regulations arising from the normal employment relationship should not be avoided through the use of contract work; subcontracting, or working at home arrangements or through apprenticeship schemes where there is no real intention to transfer skills or provide regular employment, nor should any such obligations be avoided through the excessive use of fixed-term employment contracts

COMBATING VIOLENCE AND HARASSMENT, HANDLING INTERNAL COMPLAINTS

The Company, through its Policy for Combating Violence and Harassment in the Workplace, aims to ensure the provision of a safe working environment, without any form of harassment and intimidation for all members of the working community. To this end, it is explicitly and unequivocally stated that any act of violence or harassment at work is strictly prohibited. The Company has a zero-tolerance policy for any form of violence or harassment in the workplace, and treats all incidents with objectivity and promptly investigates relevant complaints through its existing complaint handling mechanism.

NO CRUEL OR INHUMANE TREATMENT IS ALLOWED

Physical abuse, punishment, threat of physical abuse, threat of sexual abuse, verbal abuse or other forms of intimidation are prohibited.

Examples of harassment include:

- innuendos, mockery, obscene, sexually explicit or racist jokes or comments.*
- the use of offensive language when describing people with disabilities.*
- comments about someone's appearance or character that cause shame or embarrassment.*
- watching, stalking, and unwanted verbal or physical attention towards a person.*
- offensive and persistent questions about one's age, marital status, personal life, sexual interests or preferences, and similar questions about one's race or ethnicity, including cultural identity and religion.*
- Sexual gestures or persistent proposals for dates or threats,*
- Suggestions that one's sexual favors can advance one's career or that refusing to enter a sexual relationship may negatively impact one's career path in the company*
- rude gestures, touching and any kind of unwanted physical contact.*
- the dissemination of malicious comments or insulting someone mainly due to discrimination based on age, gender, type of marriage, civil partnership, pregnancy and maternity, any disability, sexual preferences, religion or "beliefs";*
- verbal or gestural threats, insults in public or in private, - belittling or ridiculing a person or his abilities, either in private or in front of third parties,*
- outbursts of anger against someone, - the exercise of persistent or unjustified criticism,*



- *exclusion from social events, working group meetings, discussions and collective decisions or planning, - cyberbullying, - offensive emails, letters and phone calls.*
- *The offer of benefits (e.g. promotion or salary increase), in exchange for sexual favors or the creation of an environment that promotes "sexual intercourse" as a means of professional development in the workplace.*
- *The threat of retaliation in case of rejection of sexual proposals or revenge against the person who refuses the sexual proposals.*
- *Visual behavior: obscene gestures, display of sexually offensive graphic materials in electronic and printed form (e.g. e-mails, voice messages, books, files, photographs, etc.), cartoons or posters, or any material with obscene or sexual innuendos.*
- *Verbal behavior: derogatory comments, sexual innuendos, use of sexual "language" or "jokes" of sexual content.*
- *Verbal abuse of a sexual nature: sexual comments about a person's body, use of sexually derogatory comments in the description of a person, sexually suggestive or obscene comments in a conversation, letters, invitations, notes or other comments, adjectives.*
- *sending sexually explicit messages via phone message (SMS), email, social media, fax or letter*
- *Sending obscene photos or messages in any way and posting comments, photos, etc. on social media.*
- *Physical contact: touches, pinching, groping or gestures of a sexual nature, strokes, nudges, etc.*

PROTECTION OF EMPLOYEES WHO MAKE COMPLAINTS/ VIOLATIONS

The Company has a Whistleblowing Policy and urges employees who have knowledge or reasonable reason to suspect that they are conducting behaviors that violate the Code of Conduct or other Regulations, to immediately report these facts to the Reporting and Monitoring Officer (HCAA).

The Company shall not retaliate against any person who reports in good faith information regarding potential violations, or who participates in any investigation or proceeding by the Company or government authorities, unless it is determined that the information provided was knowingly false. The details of persons and complaints are kept confidential.

The Company takes all necessary measures to maintain confidentiality and not to disclose the identity of the individual and the information submitted by that person. Disclosure of the above takes place only when: – it is deemed necessary to conduct an effective investigation and take appropriate action – it is required by applicable law

ENVIRONMENT

The Company takes initiatives to promote environmental responsibility and supports the development and dissemination of environmentally friendly technologies. It implements an environmental management system based on the ISO 14001 standard and records CO₂ emissions following GHG Protocol and ISO 14064 standard, with the aim of limiting and the reduction of the environmental footprint. The Company has aligned its strategy with



actions and actions aimed at protecting the environment and reducing the negative impact on it. In this context, it has an advanced biological treatment system, through which the management of liquid waste is carried out, while it cooperates with properly licensed external partners for the management of solid waste. The Company's environmental protection policies focus on the continuous improvement of environmental management and the development of initiatives to protect the natural environment and the quality of life in the areas where its facilities are located. The Company is fully compliant with all environmental legislation, including obtaining and maintaining all permits and approvals arising from its business activity.

COMMITMENT TO SUPPLIERS AND CUSTOMERS

The Company provides all prospective suppliers with equal opportunities impartially. Their selection is based on objective criteria such as price and quality, as well as the reliability and integrity of the supplier. It is prohibited to give or receive any illegal commissions, bribes, or similar payments of any kind under commercial agreements.

The Company does not enter in a business relationship with a supplier or partner that is known to operate in practices that abuse employees, such as child exploitation, corporal punishment, mistreatment of women, forced labor, or other forms of unethical and unfair labor. The above practices are condemned by the Company.

The Company does not discriminate against customers and place them all on the same basis of business ethics.

The Code of Conduct is characterized as "zero tolerance" for any behavior that constitutes a violation of this document. Subsequently, the Company will take all necessary measures to prevent behaviors that do not comply with the Code of Conduct and will implement appropriate corrective actions to mitigate the repetition of similar behaviors. People of the Company who violate the Code may suffer disciplinary consequences, which may include up to the termination of their cooperation with the Company.

WE ARE COMMITTED TO OUR CUSTOMERS/SUPPLIERS/EMPLOYEES TO FOLLOW THIS CODE OF CONDUCT. IN THE EVENT THAT ANYONE FINDS ANY DISCREPANCY, COMMENTS ARE WELCOME FOR PROPER INVESTIGATION.

CALL US CONFIDENTIALLY AT +302331023311 (ext.123) Head of Receipt and Monitoring of Reports.

OR EMAIL US AT qa@venusgrowers.gr and/or hr@venusgrowers.gr