

# CODE OF ETHICS FOR BUSINESS PARTNERS

VERSION 1 | 9th APRIL 2024

Board of Directors Approval - Resolution 842/9-4-2024

ATHENS MEDICAL GROUP

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# INTRODUCTION

Since its founding in 1984 by Dr George V. Apostolopoulos, the ATHENS MEDICAL Group has been committed to operating responsibly towards people and society by offering top-quality, cutting-edge primary and secondary healthcare services that meet the most stringent international specifications and certification standards.

By now, nearly 40 years after its founding, the Group has incorporated into its business activities internationally recognised rules, principles and values pertaining to business, ethics, sustainable development, environmental protection and respect for human rights.

This Code summarises the ATHENS MEDICAL Group's values, principles and rules of ethics with which the Group's business partners must comply.

Business partners include individuals or organisations providing services, projects or products to the ATHENS MEDICAL Group.

The ATHENS MEDICAL Group's Code of Ethics for Business Partners is not intended to replace existing business partner policies; but it must be followed by any third-party conducting business with any ATHENS MEDICAL Group company, and applies to suppliers, contractors, natural persons, and providers of projects, services or products.

# 1. KEY PRINCIPLES AND COMMITMENTS

The ATHENS MEDICAL Group fully complies with national and international laws and observes and applies in its business activity and operation standards of integrity and ethics, as defined (indicatively) by:

- The Universal Declaration of Human Rights (UNIVERSAL DECLARATION OF HUMAN RIGHTS - United Nations Regional Information Centre - Greece (unric.org)).
- The Principles of the UN Global Compact - Ten Principles of the UN Global Compact - Global Compact Network Greece.
- The United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) (ratified by Greek Law 1342 of 1 April 1983).
- The United Nations Guiding Principles on Business and Human Rights (Intro Guiding PrinciplesBusinessHR.pdf (ohchr.org)).
- The Global Sustainable Development Goals (The 2030 Agenda for Sustainable Development - United Nations Regional Information Centre - Greece (unric.org)).
- The fundamental principles of the Greek Constitution.
- The United Nations Convention Against Corruption.
- The Organisation for Economic Co-operation and Development (OECD) Principles of Corporate Governance.

# 2. REQUIREMENTS FOR SUPPLIERS

The ATHENS MEDICAL Group expects its Business Partners, for their part, to adopt the following conditions and principles in their business practices and operation by implementing relevant policies, procedures and controls:

### 2.1 Integrity and respect in commercial transactions

In any transaction with the ATHENS MEDICAL Group, its Business Partners are required to fully comply with the whole of the legislative and regulatory framework that governs their operation, refraining from any irregular or unethical business practice or conduct.

### 2.2 Protecting human rights

The ATHENS MEDICAL Group's Business Partners are bound to safeguard human rights, specifically by:

- prohibiting child and forced labour
- observing working hours
- complying with the right to a living wage
- practising non-discrimination

### 2.3 Adopting occupational health and safety measures

The ATHENS MEDICAL Group's priority is to offer a modern work environment that respects people and labour rights, and promotes trust, a team spirit and efficiency.

The ATHENS MEDICAL Group implements measures to safeguard the ongoing maintenance and improvement of a work environment that ensures the health and safety of employees through an integrated system of effective monitoring, prevention and management of risks related to the scope of its work and its activity in general.

In addition, the Group demonstrates zero tolerance for malicious or offensive behaviour of intimidation or harassment in the workplace, with the aim of creating a safe work environment with equal opportunities.

The ATHENS MEDICAL Group's Business Partners are bound to implement in their own workplace similar systems to safeguard health and safety, prevent and manage risks, and ensure an optimal work environment.

### 2.4 Refraining from acts to exert influence / Anti-bribery

The ATHENS MEDICAL Group recognises the offering of gifts of courtesy and hospitality as an integral part of business practice and culture, on condition that these are within the context of social decency and interaction, of small, symbolic value, are offered with transparency and reason, and not repeatedly to the same person.

Offering or accepting gifts, hospitality/entertainment or any other benefit related to performing one's duties and which aim at or may be perceived as aiming to establish any type of obligation, or creating or maintaining some business advantage, is expressly prohibited. Offering or receiving gifts or hospitality to/from state officials or public officers, as well as making cash contributions to any political party, is also expressly prohibited.

The ATHENS MEDICAL Group's Business Partners are required to respect the Group's current Policy on Ethics and Combating Corruption and Bribery by implementing appropriate policies and are bound to abide by all laws and regulations against corruption and bribery.

### 2.5 Avoiding conflict of interest

The ATHENS MEDICAL Group's Business Partners are required to comply with current legislation regarding conflict of interest and to take necessary measures to prevent what may constitute a conflict of interest or which may lead to conflicts of interest.

### 2.6 Environmental protection

The ATHENS MEDICAL Group's Business Partners must comply with laws and regulations regarding environmental protection and are asked to take every reasonable measure to minimise any negative impact on the environment in which they operate.

### 2.7 Maintenance of financial records

The ATHENS MEDICAL Group's Business Partners are expected to maintain complete and accurate financial, administrative and other data and records, fully complying with recognised accounting standards, current laws and regulations, and accounting rules.

### 2.8 Observing rules of competition

The ATHENS MEDICAL Group's Business Partners must operate in accordance with the rules of free and fair competition and must abstain from committing acts or omissions that may harm the reputation, good standing and integrity of the Group.

### 2.9 Protection of personal data and information

Business Partners must comply with current laws on protection of personal data and information security.

### 2.10 Intellectual property rights

Business Partners must protect trademarks, domain names, logos/marks, distinctive features, policies and procedures, databases, and publications which are part of Group property.

## 3. NOTIFICATION - RIGHTS TO AUDIT

Every Business Partner conducting business with the ATHENS MEDICAL Group must provide upon request the information that substantiates its compliance with this Code.

The ATHENS MEDICAL Group reserves the right, either through any of its companies trading with a specific supplier/Business Partner, or through an external auditor, to undertake an audit for the purpose of evaluating that Partner's compliance with this Code.

## 4. MONITORING AND REPORTING

The ATHENS MEDICAL Group expects its Business Partners to report any concerns or observations relative to identified dysfunctions or omissions they have become aware of with regard to following policies and procedures and compliance with the legislative and regulatory framework.

**Submitting questions & complaints**

Any issue, question regarding this Code and its application, and any report/complaint regarding an actual or alleged violation may be submitted anonymously or signed:

a) By using the online platform mailbox: https://app.myethos.eu/mailbox/d979fa28-49d6-439f-a52e-dfb7306f23fb and following the instructions found there.

b) Verbally by personally meeting with the Responible Officer for Receiving and Monitoring Reports (YPPA) at the Group. Such a meeting must be set within 3 days of the request made by the reporting person.

c) In writing by sending an email to the address: yppa@iatriko.gr
or to the e-mail address: compliance@iatriko.gr

d) In writing by letter delivered by post to: Delfon & 1 Sarantaporou Streets, Marousi, Attica,
Attention to: Compliance Officer /Responsible Officer for Receiving and Monitoring Reports - ERAKLIA PEPPA and marked as "CONFIDENTIAL".

## 5. APPLICATION OF CODE OF ETHICS - CONSEQUENCES OF NON-COMPLIANCE

This Code of Ethics for Business Partners was approved by the Board of Directors of ATHENS MEDICAL CENTER S.A. and applies to all companies operating under its control.

The ATHENS MEDICAL Group's Business Partners are bound to comply with this Code, their knowledge of which is demonstrated by both their signature to any agreements or contracts related to their business with Group companies, which include the main provisions of this Code and requirements applying to Business Partners, and by its posting on the Company's website.

Any violation by the ATHENS MEDICAL Group's Business Partners of the principles and commitments set out in this Code entitles the contracting Group company to terminate any agreement/contract with immediate effect upon delivery of the relevant announcement to the counterparty, without prejudice to restoration of any losses resulting from said violation.

It is noted that the Group reserves the right to amend this Code.

## ANNEX I: DOCUMENT HISTORY

| Date of Issue / Revision | Version Number | Detailed Changes | Approval | Date |
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| 09-04-2024 | 1η | | Board of Directors Resolution 842 | 09-04-2024 |
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