



CODE of CONDUCT

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TABLE OF APPROVAL AND REVISIONS OF THE MANUAL

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CHAPTER 1: SCOPE AND PURPOSE

The Code of Conduct serves as an extension of GR8 GEO's values, designed to help recognize and resolve the ethics and compliance issues that may arise in our work. It provides general information and practical advice about the behavior expected of our employees to conduct our business ethically and comply with the law. GR8 GEO is committed to the highest standards of ethical business conduct and seeks to do business with customers and partners who share these values. The purpose of this document is to describe the GR8 GEO Code of Conduct, i.e., the actions the company undertakes to enable our employees to behave honorably and act with integrity in our business dealings, in order to build relationships as independent advisors and trusted professionals. Each employee of the Company is expected to read, understand, and comply with the present code, policies, and business practices of the Company and commits to abide by the rules and principles specified therein.

CHAPTER 2: OUR VALUES

The GR8 GEO core values include:

1. **DELIVERING RELIABLE SOLUTIONS:** meeting our clients' needs by developing reliable and economical solutions, reducing uncertainties and over-conservatism in design, providing simple answers to complex problems.
2. **INTEGRITY:** Acting with honesty and fairness without compromising the truth. Being able to say no to malpractices, misconduct, corruption, and illegal activities.
3. **TRANSPARENCY:** Being able to justify our actions and decisions, creating clarity and reliability.
4. **TEAMWORK:** Share information, knowledge, ideas, and results transparently with colleagues.
5. **DEVELOPING SUCCESSFUL PEOPLE:** Creating a dynamic/challenging working environment whereby all employees can grow their abilities, improve, and perform to the highest of expectations.

CHAPTER 3: CORE PRINCIPLES OF CONDUCT

Fair Employment

GR8 GEO encourages openness to transparency, teamwork, and trust. We respect each other and value the diversity that comes from our different backgrounds, experience, and views. GR8 GEO is an equal opportunity employer and bases employment decisions on merit, experience, skills, and potential. We abide by all applicable civil rights laws in the areas we work and strive for a workplace that is free from any forms of discrimination, harassment, or bullying.

Proper Use of Confidential & Proprietary Information

GR8 GEO employees may have access to various types of proprietary, confidential, or private information belonging to GR8 GEO or its customers, suppliers, employees, or others (confidential information). Safeguarding such information is an important responsibility and is critical to be treated with utmost care and strict confidence by the employees accessing such information. Any unauthorized disclosure or misuse of such information by an employee either during or after the employment period with the Company could be harmful to the Company, its customers, or helpful to its competitors. Employees must use confidential information only for its intended purposes and as part of their duties at GR8 GEO. Such information may be shared with employees or other persons only on a need-to-know basis, as authorized by the GR8 GEO person responsible for such information. Special care should be taken in cases of disclosing or receiving information containing personal information of any kind of EU citizens or for any other persons located in the EU. Prior any exchange, the third party must provide evidence of compliance with General Data Protection Regulation ("GDPR").

Commitment to Health, Safety, Security, and Environment

GR8 GEO conducts all business with the greatest care for the environment and for the health and safety of its employees, partners, contractors, and customers. GR8 GEO is committed to providing a healthy, secure, and safe workplace and to protecting the environment in accordance with applicable laws. HSSE is every employee's responsibility, and each one must fully comply with applicable HSSE laws while understanding and observing the Company's HSSE policies. All employees must at all times be vigilant over any unsafe or hazardous actions or conditions that could lead to HSE risks.

Accurate Recording and Reporting of Information

GR8 GEO employees are expected to use the utmost care to accurately record and report information in business records and reports. In some cases, the omission of necessary information can render a report or record inaccurate.

Bribery and Corruption

GR8 GEO is committed to full compliance with all domestic and international anti-bribery laws, regulations, and conventions that prohibit corrupt actions in obtaining or retaining business or obtaining any other improper advantage. The commission or receipt of bribes in any form is unacceptable. Bribery includes the offering, promising, giving, or receiving of anything of value to or from a public official or a private individual with the intent to obtain or retain business or gain an unfair advantage, including influencing selection procedures or decisions of government, corporations, or GR8 GEO. No bribe should ever be offered, and any demand for a bribe must immediately be refused. Breaching anti-bribery and anti-corruption laws is a serious offense. Companies and individuals breaching these laws may be punished by fines, and individuals may also face imprisonment. Most countries have laws prohibiting bribery and corruption that also cover actions carried out beyond the country's borders. Everyone at GR8 GEO must comply with these laws.

Conflict of Interest

Employees must avoid situations where personal interests conflict with the interests of GR8 GEO and our clients. They must disclose any potential conflicts of interest and seek guidance to resolve them appropriately.

Social Responsibility

GR8 GEO is committed to contributing positively to the communities in which it operates. Employees are encouraged to participate in social responsibility initiatives and conduct business in a manner that respects human rights, diversity, and inclusivity.

Environmental Policy

GR8 GEO recognizes its responsibility to minimize its environmental impact and promote sustainable practices. The company complies with environmental laws and regulations and strives to reduce its carbon footprint through responsible resource management and waste reduction initiatives.

Human Rights

GR8 GEO respects and upholds human rights in all aspects of its operations. The company prohibits any form of discrimination, forced labor, child labor, or any other human rights abuses, both within its own operations and throughout its supply chain.

CHAPTER 4: COMPLIANCE

It is of utmost importance to understand that most problems in business conduct can be avoided by exercising common sense. In some occasions, an employee might be unsure about what is the right thing to do in a business situation. In such cases, step back from the situation and consider these questions:

- Is it legal? Should I consult with the company's legal counselor, or the General Manager?
- Is it in line with our core values?

- Does it comply with our policies and practices?
- Does it protect the privacy at all times?
- Am I involving the right people?
- Would it be fair and honest to everyone involved?
- Would I feel comfortable if I read about my actions in a newspaper, or had to explain them to a judge? • How will I feel about myself afterward?
- Will my actions stand the test of time?

If an employee hesitates or if the answer to any of the questions above is “no,” do not take the action. If you are still in doubt, seek guidance by discussing with the General Manager or by directly consulting our legal counselor.

CHAPTER 5: REPORTING A VIOLATION

GR8 GEO depends on its employees to report violations or potential violations of the GR8 GEO Code of Conduct so that the company can take the appropriate action and remedy the situation. Reporting violations should be done to the General Manager. The Company will promptly investigate and take appropriate action. Any report received will be treated in the strictest confidence, and no personal details of the person making the report will be made public.

A violation of the rules and standards set forth in Our Code of Conduct and GR8 GEO policies and instructions may be grounds for termination or other disciplinary action. Disciplinary action may be taken against any individual who:

- Authorizes or participates in a violation of the Code of Conduct rules and standards or GR8 GEO policies or instructions
- Improperly or negligently supervises a person who commits a violation
- Fails to report a violation or withholds relevant information about a violation
- Attempts to retaliate against an employee who reports a suspected violation