



# Code of Conduct and Ethics

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# Code of Conduct & Ethics



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## A message from the Chairman

“ Our vision is to create a better tomorrow for everyone, based on technology, sustainable development, innovation & entrepreneurship

Quest Group’s “Code of Conduct and Ethics” is not just another corporate document that lists a set of rules for the Group's personnel. It is something more than that. It is our statement of who choose to be, how we conceive entrepreneurship and business environment, and what relationships we shape between each other. **It is our commitment to abide by specific rules, which should be known and followed by everyone.**

Our Group was developed upon a very strong set of principles and values that guide and inspire us. These principles and values determine our activities and behavior and make us proud of the quality of our people. **Ethos, integrity, responsible entrepreneurship, sustainable development and our own commitment to our values** are the cornerstones of our culture and philosophy and stand above everything else.

*Our success and image depend on each and every one of us. We must systematically follow everything that we believe in and everything we strive for, in an unwavering manner. In order for this to happen, we must know what should be done and communicate it effectively to any interested party as well.*

### We ensure

that all our actions meet high ethical standards and we have zero tolerance for any deviation from full regulatory compliance and the contemporary corporate governance principles. We invest in relationships based on trust with all our stakeholders, we protect the reputation of the Group and its companies with our own actions and behavior and we seek to create value for everyone.

### We firmly believe

that the effective implementation of the Code’s rules in every aspect of our professional behavior can assist in our continuous development, strengthen the Group itself and ensure a better tomorrow for every one of us.

”

**Theodore Fessas**

Chairman of BoD – Quest Holdings

# 01.

## Purpose & Scope of the Code of Conduct & Ethics

At Quest Group, the relationships we create internally between each other, as well as externally with our partners, are based on **a set of principles and values.**

➤ **Adherence** to these principles and values, as well as compliance with **current legislation**, are **non-negotiable** and are defined by the Code of Conduct and Ethics of the Group.



Read more  
Chapt 01  
Introduction...

Everyone can use the Code of Conduct and Ethics as a guide to get informed about his/her obligations with regards to the right professional behavior and ethics in our everyday activities.



**transparency**  
**integrity**  
**reliability**



**Who should  
abide by the Code?**

- ✓ The Management of each of Quest Group's companies
- ✓ The employees of each company

**Every one of us**





## What are the obligations of the Management?

### The Management must:

i.

**Be**  
a role-model

ii.

**Ensure**  
compliance  
with the Code

iii.

**Create**  
a work environment  
where complaints  
and concerns can be  
expressed freely





## What are the obligations of the employees with regards to the Code?



### The employees must:

➤ **Be** aware of the content of the Code

➤ **Comply** with its requirements

➤ **Participate** in relevant training

➤ **Report** any violations or concerns

➤ **Not violate** or **bypass** the rules of the Code



## 02.

# The Code

**What exactly does the Code include?**



**Principles & Values of the Group**



**Obligations & Commitments  
of Employees**



**Obligations to Third Parties**



Read more  
Chapt 04  
Code...



## Principles & Values of the Group

### Respect of Human Rights

We loyally adhere to labor legislation and respect the internationally recognized human rights, such as the 10 Principles of the United Nations Global Compact.



Our behavior towards everyone is governed by the principles of

**justice, transparency, dignity, respect and understanding.**

#### We respect, acknowledge and protect:

- ✓ **Diversity**
- ✓ **Physical and mental health**
- ✓ **Work-Life balance, as well as health and safety within the workplace**
- ✓ **Non-discrimination**
- ✓ **Equal employment opportunities for everyone**



#### We forbid:

- ✗ **Behaviors and actions that may lead to discriminations**  
based on gender, religion, skin color, nationality, disability, age, family status, or sexual orientation
- ✗ **Any kind of harassment**  
(sexual, psychological, etc.)
- ✗ **Cases of verbal or physical violence and abuse**
- ✗ **Cases of bullying**



## Principles & Values of the Group

### Health and Safety



#### **We ensure**

a completely healthy and safe work environment by taking strict measures to prevent accidents and injuries of our employees.

#### **We encourage**

the immediate report of any injuries or other unsafe working conditions.



### Environmental Responsibility

The Management of the Group uses the Sustainable Development Goals (SDG's) of the United Nations as a reference framework and follows the Greek Sustainability Code, in its environmental policy.

#### **We protect**

the environment and we fully comply with the legislative, regulatory or any other international framework in effect.

#### **We strive**

to limit the environmental footprint of our business activities.

### Personal Data Protection

#### **We protect**

the personal data of our employees as well as of those who deal with Quest Group companies, in compliance with the relevant legislation.



## Principles & Values of the Group

# Business Ethics & Regulatory Compliance



**Responsible entrepreneurship** is a key component of our culture and **compliance with the legislation** and our corporate Policies and Procedures is non-negotiable.

## Money Laundering

**We take measures** to avoid money laundering through our transactions with third parties.



## Political Impartiality

**We remain independent** from political activities and any ideological and political issues, but we fully respect the active participation of our colleagues in political activities and matters of public interest.

Participation in political activities is allowed only when it takes place at an individual level, using individual resources and time and when it is clearly stated that it is not related to Quest Group.

*We, also, refrain from financing political parties*



## Obligations & Commitments of Employees

### Conflict of Interest

We avoid any situations in which our personal interest is against the interests of Quest Group, and we don't get involved in competitive activities, neither on our own behalf, nor on behalf of a third party.

### Data Protection and Confidentiality

**Each one of us has the responsibility to ensure the confidentiality of information** such as financial data, business strategies, investment data, etc. We must avoid actions that lead to disclosure of privileged and confidential corporate information and data.



We must all ensure confidentiality and protect any privileged information in our possession.



The exploitation of confidential and important information for stock exchange transactions in shares of the Company is **strongly prohibited**.



The disclosure of important information to third parties outside the Group is, also, **prohibited**.



Read more  
Chapt 04  
Code...



## Obligations & Commitments of Employees

### Assets and Facilities

It is part of our obligations to protect the assets and facilities of the Group's companies and to use them only for the intended business purposes.

### Intellectual Property

Any products or services developed during the operation of the Group's companies' activities constitute their intellectual property and are considered assets of the Group.

#### We must

- protect any important features, ideas or patents developed by the Group's companies.
- not provide products or services to third parties for our own benefit.

### Internet Behavior and Mass Media

We must use social media **wisely and carefully**, in order to ensure the confidentiality of corporate matters and protect our own personal reputation, as well as the reputation of the Group.



**We do not make any announcements** to the media regarding matters of confidential information or intellectual property rights of the Group without prior approval.



## Obligations to Third Parties

### Offering and Accepting Gifts

We can accept promotional gifts or items offered within the limits of professional courtesy, as long as their price is not particularly high (up to €100).



**We do not offer, nor do we accept money or anything of value, as a gift, for our own benefit.**



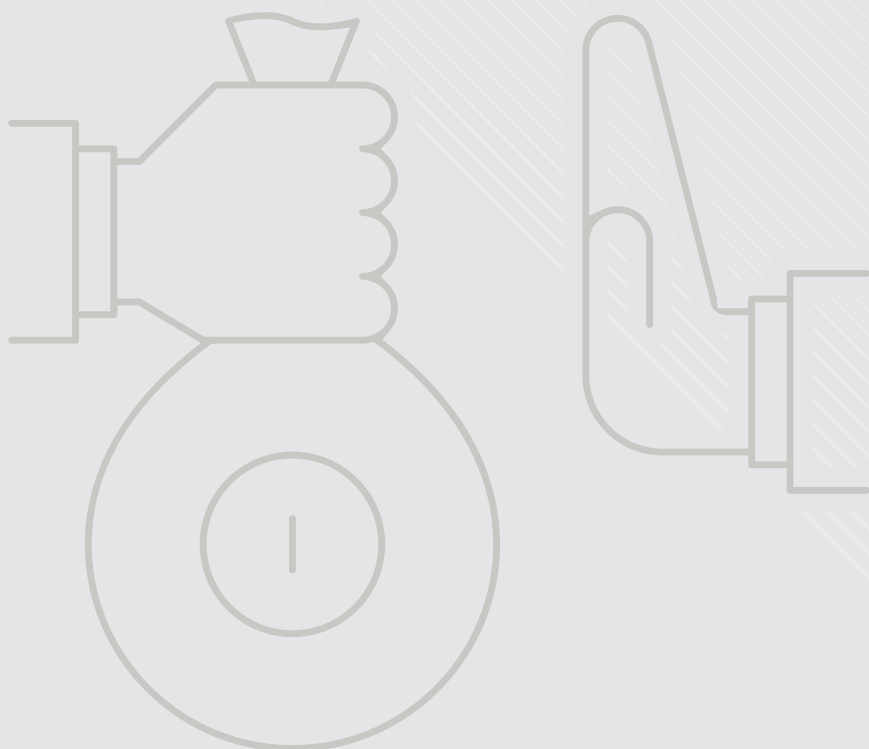
**We do not offer a gift or benefit of any value to civil servants or officials.**



**We do not accept promotional gifts or other benefits** (invitations to social events or any form of entertainment, excursions, sporting or cultural events, travel, etc.) **from third parties if they intend to influence our judgement or they are offered as an exchange for something.**



**We do not offer any gifts or benefits that exceed the limits of professional courtesy to third parties, with the aim of influencing them for the Group's sake.**



Read more  
Chapt 04  
Code...





## Obligations to Third Parties

### Fraud, Corruption and Bribery

We have **zero-tolerance** for fraud, bribery and corruption.

**We do not tolerate any kind of fraud**, and any action or omission that could possibly expose the Group at risk of fraud.



**It is expressly forbidden** to any employee to offer or promise any benefit to ensure a business advantage or favorable treatment.

### Sponsorships and Donations

#### To organizations

We make donations and sponsorships with transparency, and always **in accordance** with respective legislation or the Group's policy. Within the cadre of Corporate Social Responsibility, the beneficiaries of these donations and sponsorships can be organizations, associations, foundations or administrative services that support education, sports, culture, vulnerable social groups or science.

#### To natural persons

We can provide donations or sponsorships to individuals, such as scholarships for students of any level, etc.



**Our donations must not intend to obtain commercial benefits.**



## Obligations to Third Parties

### Relationship with Customers and Suppliers

The transactions with our customers and suppliers are **conducted in a fair, responsible, and transparent manner**, with no intention of deception, in accordance with our Policies and Procedures.

We seek long-term cooperation and the mutual satisfaction of everyone's interests.

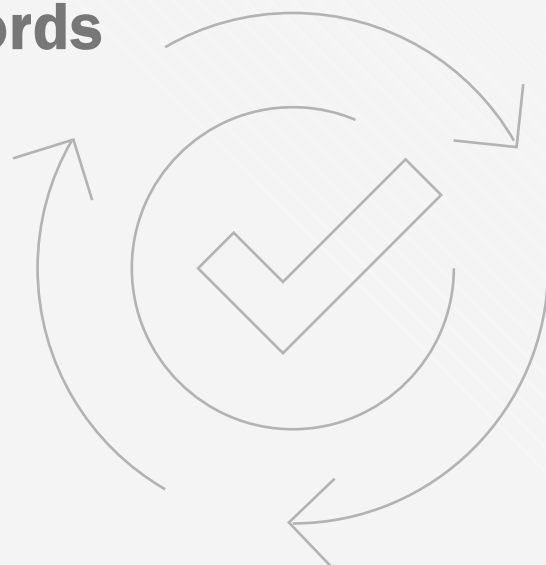


### Cooperation with the Supervisory Authorities

All the information offered to the Supervisory Authorities are accurate and given in full transparency and in a timely manner. The information is handed out only by the duly authorized persons.

### Financial Transactions Records

We keep an adequate and **effective internal control system** so that the transactions and assets of the Quest Group companies are accounted for and recorded correctly and fully based on the applicable accounting principles and the legislation in force.





## Obligations to Third Parties

### Competition Law

Our competitive position in the market is based exclusively on factors related to innovation, reliability, and the provision of high-quality products and services.



**We do not engage** in practices such as agreements with competitors on prices.

**We do not exchange** confidential information with competitors.

**We do not agree** on market shares / customers with competitors.

**We do not exploit** our strong position in the markets we operate.



# 03.

## Complaints about breaches of the Code and protection of the Complainant

It is our duty to report any incident of breach of the Code we may witness.



The employees are encouraged to report these incidents in good faith and intention and with the aim of protecting the Group. Employees must rest assured that they will not be targeted or treated unfavorably in case of such a complaint.



However, the Group has the right to take action against the complainant, if it is proven that he intentionally defamed someone or provided wrong information.



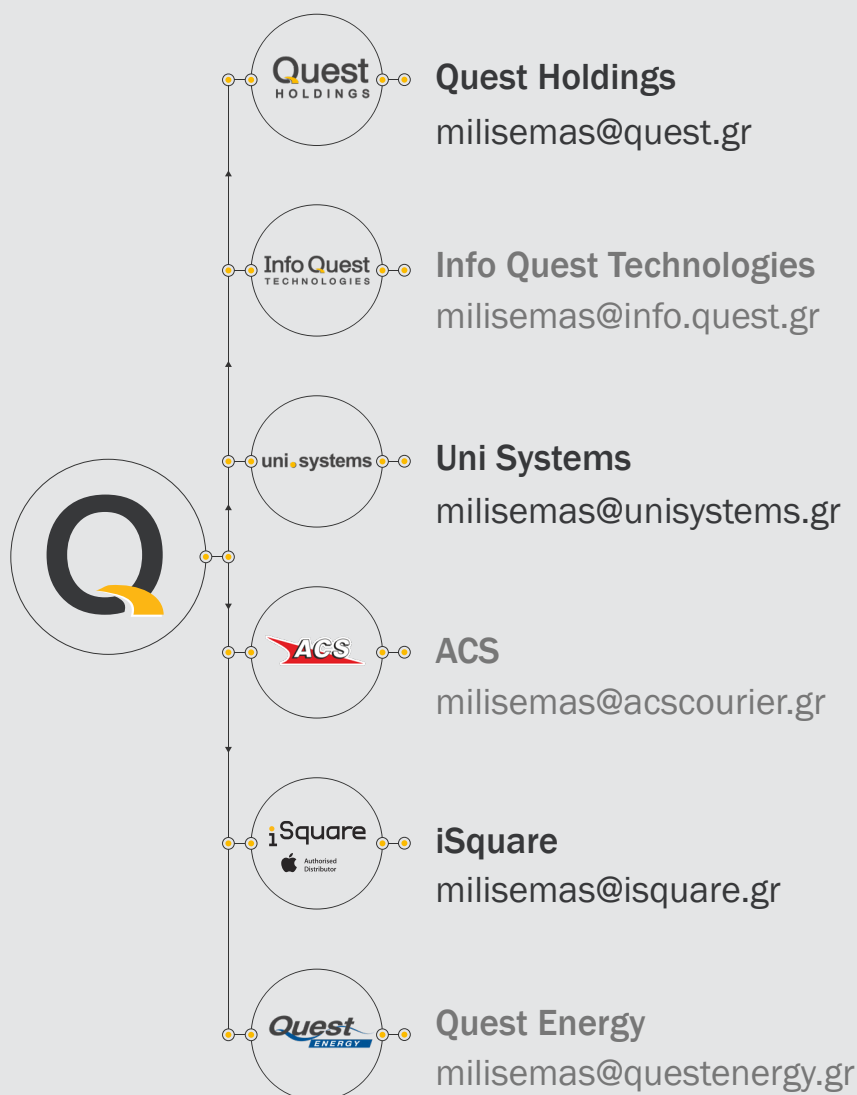
Read more  
Chapt 04  
Code...



## How to report the breaches of the Code



### By E-mail



By mail to the address of the respective company of the Group, to the attention of the Compliance Officer.



The above ways and communication channels are also valid for all the direct or indirect subsidiaries of the above listed companies.



The exact Process of a Violation Report is included in the **Compliance Management System** corporate policy.



**The Code of Conduct and Ethics**  
is a tool that aims to properly inform  
all of us and facilitate us in our daily  
professional activities.

It is our own responsibility to read and  
understand the Code of Conduct and Ethics,  
and to seek guidance when we deem it  
necessary and abide by its rules.





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# Code of Conduct and Ethics

