



Purpose & Definition of the Code of Conduct

Paper Graph is one of the most modern & steadily evolving printing companies in Greece. Its goal is continuous improvement & the assurance of its long-term development in a highly competitive environment, always with respect toward the employee, society, and the environment. To achieve our goals, we must grow as a Company but also as individuals, maintaining and ensuring a commonly accepted framework of principles and values in our daily operation and behavior, both within and outside the Company.

It applies to all Departments, every Employee, Supervisor, and Management, and to every business action and operation.

Each of us, by joining Paper Graph, undertakes the obligation to understand and apply the principles of the Code of Conduct with a sense of responsibility and pride, thus contributing to maintaining the good name and image of our Company.

Note:

Although we are not a member of the Ethical Trade Initiative (ETI), Paper Graph has adopted and is committed to following and implementing the principles of the ETI Base Code. For more information, see the attached ETI Base Code or visit the webpage:

www.ethicaltrade.org/eti-base-code

Standards of Conduct

Our business activities are characterized by honesty, integrity, and transparency, as well as by respect for human rights and the lawful interests of those with whom we interact.

Obedience to Laws

The companies and employees of Paper Graph are required to comply with the laws and regulations of the countries in which we operate.

Employees

Paper Graph is committed to diversity in a work environment where there is mutual trust and respect, where everyone feels responsible for the performance and reputation of our company.

We will recruit, employ, and promote employees in our company solely based on their qualifications and the competencies required for the job to be performed.

We are committed to ensuring safe and healthy working conditions for all employees. We will not use any form of forced, coercive, or child labor.

We are committed to cooperating with the employees in our company, in order to develop and increase the skills and abilities of each individual.

We respect the dignity of the individual and the right of workers to freedom of association.

We will maintain good communication with employees through internal company information and consultation procedures.

We protect the Fundamental Rights of all our employees to Solidarity, Meritocracy, Safety, Justice, Education, Equal Treatment, Equality, Protection of Individual Dignity, and Protection of Personal Data.

We promote Diversity and consider it a key factor in corporate growth. All company procedures (recruitment, hiring, transfers, promotions, training, etc.) are carried out without discrimination based on race, ethnicity, gender, age, religion, sexual orientation, or illness/disability.

We do not allow any form of harassment (sexual, based on different origin or religion, or other personal characteristics).

We maintain zero tolerance toward violence (physical and psychological).



We immediately report to Management any incident involving the violation of fundamental rights, discrimination, harassment, etc.

We are committed to investigating and defending every report, whether submitted in writing, in person, or via email to the address welisten@papergraph.gr

Consumers

Paper Graph is committed to supplying products and services that consistently offer value, both in terms of price and quality, and are safe for intended use.

Products and services will be labeled, advertised, and communicated with accuracy and completeness.

Partners

Paper Graph is committed to establishing mutually beneficial relationships with our suppliers, customers, and business partners.

In our business activities, we strive—where practically possible—to promote the adoption of principles similar to our own, and we expect our partners to follow business practices consistent with ours.

Environment

Paper Graph is committed to continuously improving the management of the environmental impacts of its activities and to helping achieve the long-term goal of sustainable business operations.

Paper Graph will collaborate with others to promote environmental awareness and care, to increase understanding of environmental issues, and to disseminate best practices.

The company has adopted “green” operating principles and implements environmental practices aimed at minimizing environmental consequences from each of its activities. The use of new, eco-friendly materials and technologies, actions to reduce energy and water consumption, care and upgrading of the natural landscape in the surroundings of our facilities, and the cultivation of environmentally responsible attitudes and behaviors—both among our employees and our collaborating bodies and organizations—reflect the company’s environmental stance.

Competition

Paper Graph believes in strong but fair competition and supports the development of appropriate competition laws.

The business activities of Paper Graph’s companies and employees will comply with the principles of fair competition and with all applicable regulations.

Use of Confidential Information

We protect and do not grant or disclose any confidential or sensitive information or data that we may learn during the course of our work and that could harm the company, our customers, or partners, or benefit our competitors.

Such information may concern:

Our colleagues

Our clients

Business strategic plans

Various policies (e.g., marketing strategies)

Contracts

Financial data

Costs

Investments

Know-how

The company enforces a GDPR policy and holds Data Processing Agreements with its partners (such as external accountants, security companies), ensuring that the data shared with them and their management methods are

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appropriate, and that those concerned are fully informed about it.

Business Integrity

Paper Graph neither gives nor receives, directly or indirectly, bribes or other improper benefits for business or financial gain.

No employee may offer, give, or receive any gift or payment that constitutes, or could be interpreted as, a bribe. Any demand for or offer of a bribe must be immediately refused and reported to Management.

The accounting records and supporting documents of Paper Graph must accurately describe and reflect the nature of the underlying transactions.

No undisclosed or unrecorded account, revenue, or asset of the company shall be created or maintained.

Awareness

Every new employee receives a copy of the “Paper Graph Code of Ethics” handbook.

At each revision of the Code of Ethics, the updated document is redistributed to every employee of Paper Graph, either personally (in person) or via the internal HR platform (ESS Dashboard).

Violations of the Code

The Company takes seriously every report of a possible violation of the Code of Ethics and proceeds responsibly and confidentially with a full investigation of the matter.

Following evaluation of any incident, any employee who violates the Code, supports or approves its violation, or fails to report a violation of the Code, will be subject to disciplinary action.

Decisions

The competent body to handle and investigate any possible violation of the Code of Ethics is the Board of Directors.

Disciplinary Procedure

All employees are subject to disciplinary procedures for violations of the Code of Ethics, regardless of their position in the company.

Where to Report

If we become aware of any violation of the Code of Conduct, we may contact Management, which is responsible for answering any relevant questions or concerns and providing appropriate guidance.

Management is also available to receive and respond to any concern or complaint from any employee, partner, supplier, or customer of Paper Graph regarding a possible violation of the Code that has come to their attention.

The company is committed to providing full information regarding the outcome of the investigation and any corrective actions taken.

CHIEF EXECUTIVE OFFICER

LITSA MANESI

Ethical Trading Initiative

Respect to Workers Worldwide

ETI Base Code

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions. 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry

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benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14-day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. No discrimination is practiced

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home_working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed



PaperGraph

We print. You grow.

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

