



ORBIT POLYMERS GROUP

STANDARDS OF BUSINESS CONDUCT

DECEMBER 2021

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1. INTRODUCTION

The companies of Orbit Polymers Group (Orbit Polymers S.A. and Ionian Chemicals S.A.) are firmly committed to conducting business ethically and legally. This document, the Standards of Business Conduct, is the cornerstone of this commitment and sets the standards for our actions. As part of this organisation, or while representing it, it is your responsibility to strictly follow these standards. This responsibility is shared by all staff, officers, directors, contractors, representatives, etc. internationally.

The reputation of Orbit Polymers Group is shaped to a great extent by the actions and conduct of each staff member regardless of their position within the organisation. Inappropriate conduct on the part of even one individual can cause considerable damage to the reputation of the entire team. Personal integrity and a profound sense of responsibility on the part of our staff members ultimately creates the basis for the company's reputation. We are known and trusted as a result of our strong compliance culture, our strong approach to risk management and the strength and depth of our talented staff members internationally.

We therefore ask that each one of you continuously act in a way that safeguards and advances our strong reputation. We are all representatives of and ambassadors for Orbit Polymers Group, and we expect you to conduct yourselves appropriately and always in compliance with the Standards of Business Conduct. We consider this Code not only as a binding set of rules, but also as an integral part of our corporate philosophy and thus the essence of our continued success and our future.

In addition to your Contract of Employment, the Standards of Business Conduct clearly states what behaviour is expected and provides guidelines and expectations for staff about potential violations of those standards. The spirit of the Standards of Business Conduct should be followed by all in our day-to-day activities, and any acts or potential acts not in compliance with this should immediately be brought to the attention of the Management or designated Compliance officer. We encourage and ask staff to seek guidance from the Standards of Business Conduct before taking any action if they have the slightest doubt about its appropriateness. We encourage every staff member to disclose immediately any conspicuous issues, and to act against them by informing Management and the Compliance officer.

The Standards of Business Conduct should be your guide when making decisions, but when in doubt, communication, and timely consultation with those responsible for enforcing our standards helps ensure decisions are made in the right and legally sound way. All staff members are called upon to review their own conduct according to the standards presented herein, and to consciously work towards identifying areas in which improvements can be made.

All personnel are expected to comply with the Standards of Business Conduct, copies of which are available from HR and on the Firm's shared drive, link: F:\GROUP POLICIES. Every staff member receives training on the Standards of Business Conduct and has direct access to the current version in Greek and English via aforementioned link on the shared drive. Changes to the Policies or Procedures may be made at any time and will be notified to you directly by email. Breach of these Policies and Procedures could give rise to disciplinary action.

It is expressly stated by the staff member who signs that he is fully aware of the content of the Standards of Business Conduct, and that they sign at their own free will and after resolving all questions and disagreements on it.

2. RESPONSIBILITY AND ACCOUNTABILITY

We are faced with challenges and difficult decisions every day. Each of us is responsible for making good decisions and helping our Company live up to its commitment to act with integrity and honesty. All staff members and representatives of the Company are expected to understand and comply with the provisions contained in this booklet, our policies and procedures and the law and to always conduct company business with high legal and ethical standards. They are also expected to cooperate in internal investigations of misconduct.

Violations of the Standards of Business Conduct are expressly prohibited. If you commit a violation, this may have serious consequences for the Company and for you personally. Personal consequences may include disciplinary action, employment termination or damage claims, as they have been outlined in clause 38. Furthermore, certain violations may also result in our Company to investigate any civil and criminal liability.

Management has a special function as role model, the conduct of all levels of management must be ethically exemplary. They must live up to their function as role model through honesty and fairness put into everyday practice. Similarly, they should make it quite clear in public that they and their company will not, under any circumstances, tolerate corrupt behaviour.

Management must ensure that staff members are familiar with and comply with the relevant laws and provisions. They are responsible for creating an environment that lends itself to preventing corruption. For this purpose, the principles contained in these guidelines will be made known to all staff members of the company and they are obliged to comply with the principles contained therein.

3. WHISTLEBLOWING, SUGGESTIONS & COMPLAINTS

At Orbit Polymers Group we seek and encourage an open dialogue between all staff and top management on all topics; welcoming suggestions, and complaints to help improve all aspects of the workplace where possible. If you receive information or have reason to believe that someone has violated or is violating the Standards of Business Conduct, any company policy or the law, you must promptly report this to the Compliance officer (compliance@orbitpolymers.com), alternatively through the Whistleblowing, Suggestions & Complaints Box (explained in more detail below).

We understand some staff may prefer to share suggestions and complaints confidentially, and for this reason we have adhered a lockable *Whistleblowing, Suggestions & Complaints Box* in the communal break-out area, which is checked by our Compliance officer regularly. Forms for submission into this box are provided alongside it, as well as on the shared drive. Please ensure the relevant form is filled-in to the best of your knowledge and with as much detail as possible.

Although the complaints and suggestions entries can remain anonymous, the Whistleblowing form requires your name to appropriately investigate the claim.

Please be assured that any suspected violations of the Standards of Business Conduct can be reported in confidence and without fear of retaliation. We will not tolerate any reprisal, harassment, or retaliation against anyone who, in good faith, reports a known or suspected violation. For more information, speak to your Compliance officer.

4. MAKING GOOD DECISIONS

Although the Standards of Business Conduct highlights the key principles that guide our behaviour, it cannot address every ethical situation. If a situation that is not addressed in this document arises, use your knowledge of the law, and your best judgment to make the right decisions and seek guidance from the Compliance officer.

In those situations, consider these four basic questions before you act:

- Is it legal?
- Is it in accord with the Standards of Business Conduct?
- Is it the right thing to do?
- How would it look to those outside Orbit Polymers Group?

When faced with difficult decisions, the answers to these basic questions should always be your first guide. In addition, you are always encouraged to contact the Compliance officer to discuss any questions you may have.

5. EQUAL OPPORTUNITIES POLICY & DIVERSITY

Orbit Polymers Group is committed to providing equal opportunities in employment and will not unlawfully discriminate against job applicants, staff members, workers or contract workers on the grounds of their age, disability, marriage or civil partnership, pregnancy or maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation, and other real or assumed personal characteristics.

It is, therefore, our policy to provide a work environment free from harassment, bullying and discrimination which the Company considers unacceptable behaviour, where we exercise a zero-tolerance policy to any such incidents.

All staff members have a personal responsibility to not behave in a manner that could be offensive to others. Managers and supervisors have a responsibility for investigating any complaints of discrimination against a member of their staff and for communicating this policy to staff members. The Chief Executive Officer has the overall responsibility for the effective operation of this policy.

The aim of this policy is to draw attention to, and thereby prevent, all types of behaviour which is discriminatory and, therefore, unacceptable. Any person acting in breach of this policy may be liable to disciplinary action including dismissal.

As the markets in which we compete are increasingly diverse, we must have a diverse workforce and fully utilize the talents and ideas of all staff members. Therefore, we will recruit,

develop and, retain talented people and respect and value the diversity of their contributions. Orbit Polymers Group employs individuals from more than seven countries. This diversity gives us a broader and deeper understanding of the markets and jurisdictions in which we conduct business.

Career development within Orbit Polymers Group will always be based on merit, without regard to a person's background or protected characteristics.

Orbit Polymers Group has a zero tolerance to the use of child labour within its direct operations as well as within the full supply chain.

6. ACCESSIBILITY

We have ensured all our office spaces are as accessible to wheelchair users in the same way as the average person who does not suffer from mobility issues. Lifts are equipped within the building, as well as accessible toilet facilities.

7. HEALTH, SAFETY AND SECURITY

We are committed to providing a safe and secure workplace for all employees and visitors, and have conducted risk assessments to ensure we are compliant with national workplace guidelines and regulations, of which can be accessed on the shared drive.

We aim to always have more than a third of our personnel First Aid trained, with training taking place annually. The list of currently trained first aiders can be found published on all floors in the office.

A first aid kit, and an AED (Automatic External Defibrillator) are kept in the main office landing, indicated with their relevant signage. In the very unfortunate case of an emergency where a person collapses and is unresponsive and not breathing, the AED should be used, ideally by one of the first aid trained personnel, where instructions are found inside the device. In any event, instructions as found on the device should be strictly followed.

Fire extinguishing equipment (extinguishers, blankets) is provided and placed appropriately in each room throughout the office.

Further informative documents including how to act in cases of earthquakes and fires, and how to properly position your workstation can be reviewed on the shared drive. The Company carries out an annual risk assessment in respect of your workstation to ensure that any changes that may be required are implemented. If this has not yet been carried out, you should contact the Office Manager as soon as practicable to arrange for the risk assessment so any necessary changes can be made.

Safety is approached proactively, positive safety behaviours, as well as potential risks and hazards, are identified. Coaching or being coached for safety is accepted without fear of retribution. If an incident does occur, follow-up on the event is recognized as being important for determining the root cause so that preventive actions can be taken to minimize the potential for a similar incident happening again.

Everyone is responsible for observing the rules and practices that relate to on-the-job health and safety. This includes immediately reporting incidents, injuries, and unsafe practices or conditions as well as taking appropriate and timely action to correct known unsafe conditions.

Everyone should be aware that environmental, health and safety laws may provide for significant civil and criminal penalties against individuals and the Company for the failure to comply with applicable requirements. Accordingly, all must comply with applicable environmental, safety and health laws, rules, and regulations, including occupational safety and health standards.

The Office Management is responsible for:

- Regularly testing the fire safety equipment (e.g. fire alarms, fire extinguishers, etc.)
- Developing and communicating the emergency response plan to all personnel
- Risk Assessments on all desk workstations

Although the Office Management is also responsible for the following, and will conduct regular checks on the office areas, we request that each staff member similarly:

- Reports any safety hazards or incidents immediately to management
- Participate in safety training and drills as required
- Keeps their workplace clean and organized
- Keeps the fire exits and routes clear from obstructions
- Cleans up any spillage on the floor promptly to avoid slippage

All employees should:

- Co-operate with supervisors and managers on health and safety matters
- Take reasonable care of their own health and safety

We encourage stretching and movement breaks throughout the workday.

We strictly prohibit violence or even the threat of violence in the workplace. If you feel threatened or that you are at risk of engaging in threatening or violent conduct, immediately contact the Compliance officer.

Although not obligatory, we encourage all personnel to provide us with an emergency contact, along with any allergies they may have, or any medication they are taking. This list is strictly confidential and is only shared with Office Manager and the Executive Assistant to ensure it is always readily available in the unfortunate case of an emergency where individual consent cannot be granted. We always ensure to safeguard your personal data, please see our company Data Protection Policy for more information.

8. SUBSTANCE ABUSE

The health and safety of all staff members, and the quality and productivity demanded by consumers and shareholders, require us to report to work free from the influence of any substance that could prevent us from conducting work activities safely and effectively. The unauthorized use, possession, or distribution of drugs or alcohol while on our business or at

any of our workplaces is strictly prohibited. The company will immediately inform the competent authorities in case they become aware of any of the above.

Anyone who suffers from a substance abuse problem is urged to seek assistance by contacting the human resources department. Records associated with substance abuse counselling are kept confidential, except to the extent disclosure is required by our policy, applicable law or to protect the life or safety of others. Enrolment in a treatment program will not excuse you from the consequences of a violation of this policy. The use of drugs or other illegal substances is a reason for your justified dismissal.

9. MEDICAL COVER

Orbit Polymers Group will pay for you to be entered into a group medical insurance scheme (currently provided by Generali), which covers treatment by specialist consultants and hospital treatment, subject always to the terms and conditions of the scheme. The scheme does not cover routine optical/dental or general practitioner routine examination expenses.

The Company may withdraw the schemes at any time or change the conditions of eligibility or membership and entitlement to benefit, scheme benefits and excesses, or may transfer you (and/or any related beneficiary) to a new scheme or provider as it sees fit. Your entitlement (and/or that of any related beneficiary) to participate in all such schemes will cease when your employment terminates.

10. HARASSMENT

Harassment is unwelcome conduct, whether verbal, nonverbal or physical, that is based on a person's age, disability, gender, national origin, race, colour, religion, sexual orientation, veteran status, or other protected group status. It includes unwelcome sexual advances, requests for sexual favours, and other unwelcome verbal or physical conduct of a sexual nature.

We do not tolerate harassment of our staff members by co-workers, supervisors, or any other individuals with whom staff members come into contact while conducting business. Staff members are encouraged to help each other by speaking out when another individual's conduct makes them uncomfortable and are expected to immediately report any behaviour that they believe is inconsistent with our policies prohibiting harassment.

11. BUSINESS RECORDS AND COMMUNICATION

Those who create or maintain reports, records or any other information are responsible for the integrity and accuracy of that information. Questionable entries or reports should be reported to an appropriate supervisor or manager. No one should allow himself or herself to become part of a chain of incorrect information.

Always construct documents, instant messages, voice mails and e-mails to report information in a manner that is factually accurate and would not cause damage to our reputation if made public.

12. COMMUNICATION ETIQUETTE

In your everyday communication with colleagues, clients, and suppliers, you are expected to follow general rules of etiquette and ensure to always remain kind, calm and polite. It is advised to adhere to the following set of guidelines:

- a. Phone communication
 - Present yourself by stating the name of the company and your name
 - Talk on the phone in a way which does not disturb colleagues in the office
 - Avoid personal calls within the open plan workspace
- b. Proper e-mail communication:
Please reference the "Orbit Polymers Group E-mail Communication Policy"
- c. Social Media

Ensure that statements on social media are not on behalf of Orbit Polymers Group and do not in any way harm or damage the company's reputation.

13. ABSENCE NOTIFICATION

In the case of unplanned absence due to sickness, please inform your respective line manager and HR by 09:30 a.m. at the latest on the day of your absence

You are entitled to sick pay according to the rules under Greek law, where you must bring an EFKA Doctor's certificate. Failure to do so may result in the loss of pay for the period of absence.

In the case of absence due to your participation in a business trip or your annual leave / holidays, you are required to setup an internal company use auto-reply email message. Instructions on how to do this can be found in the shared drive, link: F:\AUTOREPLY SETUP INSTRUCTIONS

14. FINANCIAL INTEGRITY

We seek to create value by achieving superior financial results. In pursuit of this goal, we must always produce honest, accurate and complete financial information, follow strict accounting principles and standards, and have appropriate internal controls and processes to ensure that all accounting and financial reporting complies with the law.

The Chief Executive Officer is responsible for implementing and maintaining a system of internal accounting controls sufficient to provide reasonable assurances that:

- Transactions are executed in accordance with management's general or specific authorization.

- Transactions are recorded as necessary to: (a) permit the preparation of financial statements in conformity with generally accepted accounting principles or any other applicable criteria and (b) maintain accountability for assets.
- Access to assets is permitted only in accordance with management's general or specific authorization; and
- The recorded accountability of assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

Everyone must ensure that no false or intentionally misleading entries are made in the Company's accounting records. Intentional misclassification of transactions regarding accounts, departments, or accounting periods violate the law and our policies. All business records must fairly reflect the transactions, be supported by accurate documentation in reasonable detail, and comply with treasury and finance policies, accounting procedures and internal controls.

All of us have the responsibility to uphold our financial integrity standards. You are expected to cooperate fully with internal and external auditors and information must not be falsified or concealed under any circumstances.

If you believe that the Company's books and records are not being maintained in accordance with these requirements, you should contact the Compliance officer or report this through the *Whistleblowing, Suggestions & Complaints Box*.

15. PROTECTING CONFIDENTIAL INFORMATION

Protecting confidential information is the obligation of everyone and continues to be even if you leave the Company, except when disclosure is authorised or legally mandated and requested by the competent authorities in writing.

For example, staff members are obliged to avoid discussing confidential information in public places or with anyone who has no need to know the information. All computers, especially laptops, should be secured and used in compliance with our policies – see the "Phishing, Password and Email Protection Policy". Confidential information includes all non-public information that, if disclosed, might be of use to competitors or harmful to the Company or its customers. One of Orbit Polymers Group's most important assets is confidential business information, which ultimately distinguishes us from the competition.

For the purposes of this clause, Confidential Information means all information which is a trade secret or other confidential or private information which is not generally known to or easily accessible by the public in any way relating to or concerning the business, finances, dealings, transactions, or affairs of the Company. It is forbidden to share confidential information orally, in writing, or in any other way. All documents, papers, records or other tangible items that contain trade secrets or proprietary information are the Company's property.

Confidential information includes all databases and technical information that create a competitive advantage in the market, personal data, or any other information that has

commercial value, or whose disclosure to third parties may be disadvantageous to Orbit Polymers Group.

Confidential information concerning Orbit Polymers Group business, staff members, and partners, is kept in a secure environment, protected from unauthorized access, use, loss or disclosure, and may only be available to authorized persons and/or if required by law.

When a staff member leaves their workplace at the end of the working day, or leaves it during the working day, they must ensure that no confidential information is obtainable at the workplace, or in any other easily accessible place. All documents that contain confidential information must be locked.

Breach of this duty of confidentiality shall be capable of constituting gross misconduct and may lead to the immediate termination of your employment.

The person is obliged to keep the business-related data secret even after the termination of their employment. Otherwise, the company reserves the right to protect its interests, which includes compensation for damages in a lawsuit.

Protecting company information also includes taking care to prevent sharing information *within* the company. Please take care to not distribute sensitive documentation to unnecessary parties. Always double check who is present in the below situations before sharing sensitive information:

- the email recipients list
- instant messaging group participants
- call / online video meeting participants
- the surrounding area

Please refer to the “Phishing, Password and Email Protection Policy” and the “Data Protection Policy” within the shared drive for more information on protecting confidential information.

16. PRIVACY

We will comply with all laws which protect the privacy and confidentiality of personal data. Such information will only be used or disclosed in a manner consistent with applicable law. Technology systems, equipment or devices should not be used to create, send, receive, or store any personal data that you wish to remain private or confidential. Further information can be found on the “Company Data Protection Policy” as well as the “Phishing, Password and Email Protection Policy” on the shared drive.

17. FAIR DEALING

You should endeavour to deal fairly with the Company’s customers, suppliers, competitors, and staff members. You should not take unfair advantage of anyone through manipulation,

concealment, abuse of privileged information, misrepresentation of material facts or any other practice involving unfair dealing.

18. PROTECTING COMPANY ASSETS

We all have a responsibility to take reasonable precautions to safeguard and make proper and efficient use of company assets. This includes taking prudent steps to protect assets from loss, damage, misuse, theft, embezzlement, or destruction.

Our assets are intended to be used to conduct legitimate company business. Any act that involves theft, fraud, embezzlement, destruction, misuse, or misappropriation of any asset is prohibited.

All documents, manuals, hardware or software provided for your use by the Company, and any data or documents (including copies) produced, maintained or stored on the Orbit Polymers Group computer systems or other electronic equipment (including mobile phones and hand-held devices), remain the property of the Company and their theft will be prosecuted as a criminal and civil case.

19. CONFLICTS OF INTEREST

Business decisions should be made in the best interests of the Company. If, during the course of your employment, you are instructed by or required to act on behalf of a client or supplier with whom you have had a previous professional, employment or personal relationship (whether during the course of this or some other employment), or where through previous contact with the client or supplier or other parties to the matter, you have gained particular knowledge relating to the case/matter in question, you must promptly disclose this fact to your relevant Manager/Director.

An example of a conflict of interest would be when a staff member is in charge of procurement or selection of a supplier, and they, or a member of their family, have a financial or personal gain from doing business with this supplier.

You must act based on sound business judgment, not personal interest, or gain, and may not:

- Take for yourself opportunities that are discovered through the use of company assets or information or your position.
- Use company assets or information or your position for personal gain; or
- Compete with the Company.

If applicable law does not specifically require otherwise, work done for the Company belongs to the Company.

Whether or not a conflict of interest exists or will exist can be unclear. If you have questions about a potential conflict of interest or become aware of an actual or potential conflict, you should discuss the matter with, and seek a determination and prior authorisation or approval

from, the Compliance officer or from the Legal representative. Conflicts of interest should be avoided unless specifically authorised.

20. OUTSIDE EMPLOYMENT

Staff may not work for or receive payment for services from any business entity that does or seeks to do business with or is in competition with us. Without first obtaining approval from the legal representative, staff are prohibited from providing consulting, advisory or other services to third parties if such services are within the scope of such staff member's responsibilities with the Company. In addition, staff members are prohibited from providing advisory services to third parties with respect to Orbit Polymers Group or its competitors without the prior approval from the legal representative.

As Orbit Polymers Group has heavily invested in the continuous training of its staff, the Group expects staff not to subsequently work for any competing companies using the skills developed through the training received. In this case, they must comply with the terms of article 15 "PROTECTION OF CONFIDENTIAL INFORMATION" of the Standards of Business Conduct and not disclose information to third parties even after leaving Orbit Polymers Group.

21. PERSONAL INVESTMENTS

Owning stock in a public company is usually not a conflict of interest. However, a conflict of interest may arise if you or a member of your immediate family has a significant interest in a company that does or seeks to do business with or is in competition with our Company. A nominal or portfolio investment in a public company or a small direct ownership via an investment fund or trust normally would not represent a conflict of interest provided it would not affect the staff member's responsibilities on behalf of the Company.

22. DISCLOSURE

As with many issues, the best way to avoid an embarrassing or damaging conflict of interest situation is to disclose any situation that may have the potential to be misinterpreted by others, including other staff members, customers, suppliers, and the public. Questions and disclosures of these situations should be addressed to the compliance officer or through the *Whistleblowing, Suggestions & Complaints Box*.

We depend on strong relationships with our customers, suppliers, and other business partners. We intend to do business only with those individuals and businesses that comply with the law and demonstrate high standards of ethical business behaviour.

You are expected to identify and report legal or ethical issues (such as those involving environmental, health, safety, security, corrupt payments or practices, or competition or antitrust violations) concerning third parties or customers that may pose a risk to the Company to the Compliance officer or through the *Whistleblowing, Suggestions & Complaints Box*. Such issues will be addressed promptly and appropriately.

23. COMPETITORS

We will obtain information about competitors, competitors' products, customers, and suppliers ethically and legally. Theft or misappropriation of third-party proprietary information is prohibited, including obtaining or acting to obtain such information from a competitor's current or former staff members, including information obtained from prior employers that are competitors.

24. ANTITRUST AND COMPETITION

We are committed to full compliance with the competition laws of the European Union, and similar laws of the other countries where we do business. Although it is beyond the scope of this document to discuss these laws in detail, anyone who has a question or concern about potential competition implications of a discussion, decision, or action has the responsibility to consult with the legal officer.

We are restricted or prohibited by antitrust and competition laws from:

- Communicating with competitors about prices and conditions of sale, bids, levels of production, or allocations of products, services, sales, customers, suppliers, or territories.
- Establishing the resale price of a product or conditioning the sale of products on an agreement to buy other Orbit Polymers Group products; or
- Making decisions to price product below cost

In addition to possible damage to our reputation and company value, violating competition laws could subject us to severe monetary penalties or civil or criminal enforcement by one or more governments and/or lawsuits by competitors, customers, or other affected parties seeking damages.

25. TRADE SANCTIONS

Orbit Polymers Group does not do business with any country, entity or individual if it would breach international sanctions laws.

Orbit Polymers Group commits to full compliance with all applicable international sanctions laws and has strict policies and procedures in place to ensure compliance. Orbit Polymers Group expects all staff members to remain up to date, and act in full compliance with its sanctions-related policies.

26. ANTICORRUPTION

The Company strictly prohibits anyone acting on behalf of the Company, whether directly or indirectly, from making or receiving bribes, improper payments or making promises of any benefit to influence another party.

Wherever we do business, we must comply with all applicable anticorruption laws. It is prohibited for any staff member, third party representative or agent (including contractors, consultants or distributors) to offer, pay, promise to pay, accept, agree to accept, or authorize payment of, any money or anything of value, directly or indirectly, to or from anyone, in order to secure or maintain an improper advantage, or to induce conduct that amounts to a breach of the expectation that a person will act in good faith, impartially, or in accordance with a position of trust.

The Compliance officer should be contacted whenever there is a concern that a payment might be viewed as improper.

Anticorruption Laws also require that we keep books, records, and accounts that accurately and fairly reflect in reasonable detail our foreign and domestic transactions. To assist staff members, we maintain strict policies and procedures to assure compliance with Anticorruption Laws.

Any third party engaged by Orbit Polymers Group must also comply with all applicable anti-corruption laws and the Company's integrity standards with respect to all affairs that they conduct on behalf of the Company. Therefore, anyone who intends to hire a consultant must follow our procedures for due diligence and obtain the prior approval from the Compliance or Legal officer. Due diligence is also required before engaging an agent or distributor for the sale of our products.

27. EXPORT CONTROL

The laws of many countries restrict trade with certain countries. We have operations and customers around the world and must comply with all export restrictions as well as applicable export control laws of all countries where we conduct business. Staff members and agents uncertain of the legal trade status of any country should contact the legal representative, or the Operations Manager.

28. MARKETING PRACTICES

We will compete for business aggressively and honestly and will not misrepresent our products, prices, or services. We will not make false or misleading claims about our products, prices, or services about the products, prices, and services of our competitors.

29. PURCHASING PRACTICES

As a group, we purchase our products or services from distinguished producers or service providers, which allows us to offer our customers high-quality products and services. All purchasing decisions are based on the best value for the Company, in alignment with the "Supplier Code of Conduct" and the "Environmental Policy" which both outline our business standards, as well as our "Supplier Evaluation Document" outlining our commercial goals. Important components of purchasing include confirming the legal and financial condition of the supplier, complying with our conflicts-of-interest policy, soliciting competitive quotes,

exploring partnering arrangements and incentive-based contracts, verifying quality, and our ethics, environmental and sustainability goals.

It is the obligation of the purchasing team to evaluate the suppliers to ensure they continuously adhere to these goals and standards, and guarantee they are graded annually against the:

- ISO file Δ11 Supplier Evaluation Form
- Orbit Polymers Group Supplier CSR Self-Assessment Questionnaire

It is the job of the purchasing team to identify any issues which may arise with our suppliers. If the purchasing team finds there is any breach to the standards, or that minimum requirements have not been met, it must immediately be reported to top management; otherwise, the purchasing manager will be liable to disciplinary action.

Suppliers which do not meet the minimum requirements under the Supplier Evaluation Form and the Supplier CSR Self-Assessment Questionnaire (as stated within the documents) must be put up for review with top management, and actions must be taken to replace them with alternative compliant suppliers when possible.

30. PRODUCT STEWARDSHIP & ENVIRONMENT

We provide quality products and services that add value for our customers, and which can be used and processed in a safe manner. We strive to improve the products we sell by reducing environmental impacts associated with their use or consumption while maintaining the value derived by the customer. We are mindful of the challenges posed by climate change, and prioritise the efficient usage of energy and environmental protection to promote conservation of our natural environment.

The sales team has a responsibility to use their technical expertise to offer product grades within our product portfolio that best suit our customer's needs, and offer sustainable and innovative alternatives where possible, either in the form of recycled material, bioplastics material, additives that activate natural biodegradation, energy efficient machinery, or any other possible new technologies for the protection of the environment. We are constantly seeking to broaden our sustainable product portfolio, with the aim of generating a substantial level of sales from the aforementioned product ranges as well as new innovative materials. Our Group is aiming to achieve an increasing number of sales derived from sustainable alternatives, such as recycled materials, additives that activate biodegradation, and bioplastics materials. More information can be found on the Orbit Polymers Group Environmental Policy.

Orbit Polymers Group expects all business partners to operate to high Health, Safety and Environmental business standards. We select business partners whom we believe share our commitment to act responsibly and in consideration of these risks. Comprehensive information relating to our environmental policies can be found in the Orbit Polymers Group Environmental Policy.

31. OFFICE ENERGY CONSUMPTION AND WASTE POLICY

We are committed to a sustainable way of working, to avoid unnecessary waste whilst undertaking day-to-day tasks. To help us reduce our environmental impact, we request all staff members to follow the below guidelines as outlined, as well as in the Orbit Polymers Group Environmental Policy.

The ERP system allows for paperless flow between departments, we suggest only printing when necessary, on both sides of each sheet.

- We have implemented LED lighting throughout all office spaces and remind staff members to turn off all lights in their respective offices when they are the last out when departing. Automatic LED lighting has been fitted in the garage.
- All bathrooms have been fitted with a dual flushing mechanism. To promote water conservation, we request all staff members only use the heavy flush when necessary.
- We remind all staff members to only start the dishwasher cycle when at full capacity, and by selecting the “ECO” wash option.
- We have installed a filter on the kitchen faucet to supply high quality drinking water and avoid the use of water bottle
- We promote safe and ecological waste disposal and recycling in our offices:
 - o Recycling bins for paper and plastic waste can be found in the kitchen area
 - o Battery Recycling container can be found above the stationary cupboard
 - o The individual desk bins are intended for paper waste only which are then recycled
 - o General waste bins can be found in the kitchen area

32. COMMUNITY INVOLVEMENT

Orbit Polymers Group is committed to corporate social responsibility initiatives, and we therefore regularly set-up various activities for staff and their families/friends alike. Although these are not obligatory, we strongly believe these activities help strengthen teamwork, boost morale, and encourage more environmentally conscious behaviour in everyday life.

We are currently cooperating with S.P.A.Y. (the Union for the Protection and Development of Mount Hymettus) for environmental initiatives, and the Hellenic Red Cross for humanitarian initiatives; although we are constantly on the lookout for new opportunities to give back to the wider community on various other social and environmental issues. We therefore seek suggestions from staff members regarding community issues they want to contribute to, to broaden the scope of our community involvement.

33. GIFTS, MEALS, AND ENTERTAINMENT

In many industries and countries, reasonable gifts and entertainment are used appropriately to strengthen business relationships. Throughout the world, one principle is common and clear: no gift, favour or entertainment should be accepted if it will obligate or appear to obligate the person receiving it. We maintain specific policies regarding providing and accepting gifts, meals, or entertainment. These policies are accessible through your manager. If you have questions, contact the Compliance officer.

34. PROVIDING AND EXPENSING

Gifts, meals, or entertainment may not be provided if they are against applicable law or the recipient's company policy, or our company policy. When provided to third parties, there must be a valid business purpose and the value must be reasonable and sufficiently modest so as not to raise the appearance of potential impropriety. In other words, you always should be aware of how the act of offering a gift, a gratuity, or entertainment might be perceived by the public, suppliers, customers, or other staff members.

No form of entertainment should be undertaken which could reasonably lead to the embarrassment of the Company or have the appearance of impropriety. Entertainment at venues that offer entertainment that is degrading or exploitive due to sexual or racial content is strictly prohibited.

35. SOLICITING OR ACCEPTING GIFTS

You may not solicit or accept gifts, meals, or entertainment, including, but not limited to, trips, lodging, event tickets, vacations, and personal gratuities. Souvenirs and gifts during the festive period up to the value of €200 or the equivalent exchange rate in the local currency, are excluded from this provision.

The policy strictly prohibits receipt of the following:

- A gift or loan of cash, cash equivalents (such as gift certificates), or securities.
- A loan of property, including vacation facilities or equipment for personal use.
- A personal service performed free of charge or for less than market value; or
- A discount on the purchase of goods/services for personal use.

36. CAREER DEVELOPMENT & TRAINING

During the course of your employment with us, Orbit Polymers Group may hold informal workplace discussions with you to discuss your future aims and aspirations and to help identify any training and development needs that you may have. This will also provide an opportunity for an assessment of individual performance, and to discuss future work requirements and how these might impact you. In some cases, these may form part of the formal appraisal process. During these discussions, you will be able to express any preferences or thoughts so that the Company can plan for the business. These discussions will treat people of different ages fairly and consistently and will ensure that there is not more favourable treatment of a staff member because of their age unless this can be objectively justified.

Staff members will be asked, from time to time, to undergo various training sessions relevant to the industry, technology, business seminars, health & safety, environmental management and social issues. For more information, please see our ISO 9001 Employee Training Process found on the shared drive, link: "*F:\ISO 9001\ORBIT ISO 9001\2) ΔΙΑΔΙΚΑΣΙΕΣ\Δ08 ΕΠΑΡΚΕΙΑ, ΚΑΤΑΡΤΙΣΗ & ΕΥΑΙΣΘΗΤΟΠΟΙΗΣΗ ΠΡΟΣΩΠΙΚΟΥ*". Kindly note, the HR or the Compliance officer should be aware of all trainings, so as they can be logged on the "Employee Training Schedule".

37. USE OF COMPANY VEHICLES

Those who use the company's cars for the execution of their work must treat them prudently, keep them clean, take care of their periodic regular maintenance, ensure the safe and legal transport of materials, and comply with the provisions of the Traffic Code.

It is strictly forbidden to drive a car when the staff member is not in a good physical condition (under the influence of alcohol/drugs, drowsy, fatigued, etc.). It is expressly agreed that fines relating to violations of the Highway Code are borne by the employee who violated the above Code. It is also strictly forbidden for non-employees to drive the company's vehicles unless they have been declared to drive and are insured for the vehicle on the insurance plan.

38. DISCIPLINARY PROCEDURE

Orbit Polymers Group requires all staff to carry out their duties faithfully, to the best of their ability and in the best interests of the Company.

It is hoped that problems with performance or conduct can be resolved by informal discussion. If this is not possible, or if the misconduct is sufficiently serious, the disciplinary procedure will be invoked.

The purpose of this disciplinary procedure is to:

- clarify the rights and responsibilities of the Company and its staff members.
- ensure fair treatment and a common approach to all staff members; and
- establish order in a disciplinary situation.

In instances where staff behaviour which would constitute misconduct, the Company may normally take disciplinary action against the staff member.

In instances where staff behaviour which would constitute gross misconduct, the Company may terminate your employment according to the labour laws and the terms of your contract.

Where during the service of a probationary period it becomes apparent to the Company that the staff member concerned will not fulfil the Company's requirements, notice of termination may be given in accordance according to the labour laws and the terms of your contract.

a. Investigation

Where an investigation is necessary, generally you will be informed in writing of the nature of the complaint against you. You will be given the opportunity (normally at a meeting with the investigator(s)) to put forward your version of events. In serious cases you may be suspended in such manner as the Company considers necessary while the case is investigated; this carries no inference of guilt and is not a disciplinary action.

The Company will expect to receive full co-operation in any investigation including a written statement (on request) from any person with relevant knowledge of the matters under investigation.

The investigator(s) will have absolute discretion as to who should be involved in any

investigation and how it should be carried out.

b. Disciplinary action

Where your performance is considered unsatisfactory or you commit an act of misconduct, you will be subject to such disciplinary action as may be appropriate according to the seriousness of the situation. The normal pattern will be:

- Stage 1: verbal warning
- Stage 2: written warning
- Stage 3: final written warning
- Stage 4: dismissal

There may however be occasions when a written warning, a final written warning or dismissal is immediately justified depending on the overall circumstances. The Company reserves the right to go to any stage of the disciplinary procedure at any time during a disciplinary matter.

c. Notice, Termination and Suspension

At any time after notice to terminate employment is given by you or the Company, or you resign without giving due notice and the Company does not accept your resignation on those terms, then the Company may at its discretion suspend you on full salary and benefits, and require you to comply with any or all of the provisions below during the whole or part of the notice period or investigation:

- Not to enter or attend the Company's premises; and/or
- Not to contact or have any communication with all or any of the Company's clients; and/or
- Not to contact or have any communication with all or any of the Company's staff members or Partners; and/or
- Not to carry out any work or duties on behalf of the Company except as may be specifically requested by the Chief Executive Officer, and/or
- Not to act as if you were involved, or represent yourself as having any authority to act, in any respect of the business or profession of the Company except as may be required by the Company; and/or
- Not to do any other act or thing which would otherwise be performed by you as part of your employment, except as may be required by the Company.

The Company may terminate your employment at any time in accordance with local labour laws.

39. STANDARDS OF BUSINESS CONDUCT TRAINING

A training session on our Standards of Business Conduct will be conducted annually. Although you will be prompted with interim updates, we encourage you to ensure you are aligned with our policies throughout the working year. There are additional documents and policies as referenced within this document available on the shared drive, of which your compliance and

understanding is required. Accepting the policies within our Standards of Business Conduct also confirms your compliance and acknowledgment of those documents, listed below:

- Orbit Polymers Group Company Data Protection Policy
- Orbit Polymers Group Health & Safety Policy
- Orbit Polymers Group Phishing, Password and Email Protection Policy
- Orbit Polymers Group Whistleblowing Suggestions and Compliance notice
- Orbit Polymers Group E-mail Communication Policy
- Orbit Polymers Group Environmental Policy

If you do not have access to the shared drive, these documents will be sent to you directly via email.

40. FURTHER INFORMATION

Further information can be obtained through the Compliance Officer (compliance@orbitpolymers.com), whom reports any compliance related business directly to the Chief Executive Officer, and is responsible for ensuring compliance with these rules.

The Company reserves its rights to make changes to this Policy from time to time. If we make material changes to this Policy, we will promptly provide notification via email.

Compliance Officer 2021-2022	Mrs. Georgia Papadopoulou
Contact Details	compliance@orbitpolymers.com

41. ACKNOWLEDGEMENT AND ACCEPTANCE FORM

[Please fill in this form and return to the Compliance Officer]

I hereby certify that I have been provided with a copy of:

- Orbit Polymers Group Standards of Business Conduct
- Orbit Polymers Group Company Data Protection Policy
- Orbit Polymers Group Phishing, Password and Email Protection Policy
- Orbit Polymers Group Whistleblowing Suggestions and Compliance notice
- Orbit Polymers Group E-mail Communication Policy
- Orbit Polymers Group Environmental Policy

I expressly declare that I have thoroughly read and I am fully aware of the content of the **Orbit Polymers Group Standards of Business Conduct**, I understand and agree to comply with the policies referred to therein and I sign this statement with free will and after resolving all my questions and disagreements on it.

I will conduct my work in accordance with the Standards of Business Conduct with the highest integrity and dedication to the principles set forth therein. I understand that any violations of the Group's Standards of Business Conduct may result in disciplinary sanctions, up to and until the termination of my employment, as the case may be, at Orbit Polymers Group.

Signature	
Name	
Date (dd/mm/yyyy)	

Please indicate the company to which you have an employment contract by ticking the box:

Orbit Polymers S.A.

Ionian chemicals S.A.