

**Code of Professional Conduct
and
Ethics**

**doValue Greece Loans and Credits
Claim Management Société Anonyme
(AEDADP)**

November, 2021

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Message from the Management

In the last years, professional ethics issues have become a key pillar for all financial institutions across the globe, including credit servicing companies (hereinafter “CSCs”). By the term “Professional ethics” we mean the framework of principles and rules that determine our professional conduct and the decisions we make as employees.

At doValue Greece (hereinafter the “Company”), these concepts are neither unknown nor new. They are part of the Company’s culture and its values throughout its history, initially as a member of a banking group, through its licensing as a CSC and currently as a member of the doValue Group (hereinafter the “Group”). Putting these principles into practice constitutes the foundation of our success as financial sector professionals. The professional success of each and every one of us forms the basis for our progress, development and the achievement of our strategic goal: to become a reliable company, in full compliance with Greek, European and international legislation and with the best practices of corporate governance.

A valuable guide in this effort is this Code of Conduct (hereinafter the “Code” or “CoC). It includes provisions of a general and more specific nature, in accordance with the legal and regulatory framework of operation of the Company and the doValue Group, as well as recognised international standards for professional conduct. By dutifully following this “guide” in our day-to-day business, we reinforce our corporate identity within the Organisation.

At the same time, the Code is a value proposition for each and every one of us, as an employee and a person. By adopting it, we can operate with professional excellence, efficiency, integrity, transparency and consistency. Our commitment to this Code and its implementation allow us to build relationships of trust, with our customers and suppliers, as well as with the debtors of the claims under management and to ensure Company’s validity and reputation vis-à-vis regulatory bodies and society in general.

The Company’s Regulatory Compliance, AML/CFT Unit and competent auditing bodies are standing by us for any questions, queries or concerns. These are the bodies responsible for the proper implementation, control and compliance with the principles and rules of the Company’s Code of Conduct and Ethics.

Starting from the licensing of the Company as a CSC by the Bank of Greece to date, we have been called upon to rise to the challenges of a new credit servicing market, which is governed by a complex, ever-changing and demanding regulatory framework. In these tough and demanding conditions, all the Company employees responded with great dedication, professionalism and ethical demeanour, elements that guided our next successful steps. Today, recognising the effort of each individual, we are certain that by consistently adhering the Company’s Code of Conduct, we are advocating its professionalism and integrity.

Thank you

Theodoros Kalantonis
Executive Chairman of the Board

Tasos Panousis
CEO

“Our behaviour forms the foundation of our personal professional success and the basis for achieving the Company’s strategic goal to be a reliable CSC, compliant with International and European legislation, and the best Corporate Governance practices.”

1. Introduction

1.1 Purpose and Contents

doValue Greece (hereinafter the “Company”) has adopted this Code of Conduct and Ethics (hereinafter the “Code”) to clearly and transparently define the values that the Company must comply with when carrying out its activities.

The Code establishes the ethical values, duties and responsibilities jointly undertaken by the Company and its associates to achieve the corporate goals. The purpose is to ensure that the conduct of recipients (see Section “Who does to Code apply to – Recipients”) is always governed by correctness, collaboration, loyalty, transparency, legality, sustainability and mutual respect, so as to avoid conduct that may contradict any of the principles mentioned above.

The Company and the Group have established a series of regulations, rules, procedures and organisational provisions that are embodied in the principles of the Code. The goal is to:

- ✓ ensure compliance with Company and Group strategy,
- ✓ achieve optimum efficiency and effectiveness of corporate processes,
- ✓ safeguard the values,
- ✓ ensure credibility and integrate accounting and administrative information,
- ✓ ensure full operational compliance with the legal and regulatory framework in force.

The rules included in the Code aim to encourage a culture of compliance and ethical commitment for the Company.

All recipients ought to comply with the Principles and Values described in the Code (irrespective of whether we find ourselves in a situation that is not included or explicitly described in it).

To ensure compliance with the principles of the Code, the Company has adopted a governance framework (as described in detail in Section 14) that includes the following stages:

- approval
- distribution
- implementation and control
- reporting of any violations/ breaches
- sanctions system

1.2 Who does the Code of Conduct Apply to and How It Is Implemented (Recipients)

All the principles and provisions of the Code apply to all parties/persons **operating within the Company** (see definitions for Staff/Recipients) and/or work with it through contractual relationships.

Furthermore, the Code applies to persons **working with the Company** on contract (third parties who work with the Company in the context of service provision or project execution). It also applies to **persons** (legal entities or natural persons) whose scope of activities is directly linked to the **management of credit portfolios assigned to the Company** (including, but not limited to, debt notification companies, lawyers and law firms, other CSCs).

All **Company's associates and suppliers of goods and services** ought to comply with Code principles and are bound to abide by the Group's Code of Ethics through relevant contractual clause.

Note that, despite the fact that on many parts the Code focuses on Company staff, all persons **assigned with executing a project or providing services to the Company** are expected to follow and comply with it, in the context of their working relationship with the Company.

In essence, the Code applies to all of us that ought to safeguard the values of the Company and the Group, in our capacity as employees or as representatives and as associates.

The rules and principles of the Code apply irrespective of how the work takes place (physical presence at the workplace, teleworking, etc.) and is in force for as long as we exercise our duties and beyond that, in cases where certain behaviours and/or actions may be linked to the Company.

The Code acts as a regulatory framework for the Company and is complementary and additional to the applicable legislation, as well as any contractual relationship between the Company and each and every one of us. The rules and principles laid down may be expanded, in accordance with the legal and regulatory framework in force from time to time. The legal and regulatory framework prevails in case of conflict with this Code or in case it includes stricter requirements. Furthermore, the Code is based on the Code of Ethics of the Group, as well as the individual policies of both the Company and the Group, which serve as a further point of reference for Company staff.

Non-compliance with or violation of the provisions of the Code is considered non-compliance with the principles of ethics and conduct that have been adopted by the Company and the Group, and, therefore, it is punishable, irrespective of the sanctions specified in the law, regulations, etc. in force.

“The Code of Conduct applies to all those who ought to safeguard the values of the Company and the Group, meaning all of us who have an employee/employer relationship, or act as representatives or associates.”

2. Our Mission and our Values

Our vision is to become the leading CSC in Greece, by building a long-lasting relationship of trust, successfully providing integrated and effective credit servicing to all our customers (credit and financial institutions, credit acquisition companies as per Article 1 of Law 4354/2015, and special purpose vehicles as per Article 10 of Law 3156/2003). At the same time, we provide effective services to the debtors of claims under management, with transparency, fully complying with the legal and regulatory framework in force for the operation of CSCs, always aiming at creating added value for our clients, employees, shareholders and the society. These render us an option and a point of reference in the CSC sector for services, management activities, servicing, effective solutions and solid prospects, now and in the future.

This goal has shaped our development and led to our robust current presence in the Greek market, and of course, it concerns the entire range of our services and activities.

The values of our Group – which reflect the philosophy and beliefs of the Company and the Group, define our particular corporate culture and determine the way we work – have played a decisive role in achieving this.

2.1. Mission

The Company's mission is to:

- ✓ create value for investors, banks and borrowers;
- ✓ manage our loan portfolios with a solution-centred sense of responsibility;
- ✓ generate prospects for a sustainable financial system and contribute towards a sound Greek economy, as the third significant pillar.

Achieving these, assists in fulfilling the Company's institutional objectives, contributing to creating and maximising the Company's value for all stakeholders (see Definitions), while respecting the principles defined in this Code.

Value creation is not just linked with increasing Company and shareholders profitability, but mainly with satisfying the needs of all stakeholders, taking into account the mutual interest of all (respect for the mutual interests).

2.2. Values

We always operate according to our values. This makes us stand out and forms the foundation of our development and our substance, in the context of our corporate and social responsibility.

We forge ahead with **Responsibility** and a sense of duty. We act with professionalism and reliability towards our customers, our partners, our colleagues, the society and the economy, creating relationships of trust.

We operate with **Transparency**, integrity, directness, honesty, ethos and clear terms, providing correct and complete information.

We promote **Innovation**, paving new ways. We strive to keep evolving in an ever-changing setting. We create, discover and adapt to remain always alert and stay one

step ahead.

We foster teamwork through **Cooperation**. We are a trusted partner, working in step to achieve the common goals and deliver. We commit to ourselves and to others.

We focus on solutions, target **Efficiency** and centre upon getting results. We listen carefully to gain an understanding and work to provide viable solutions.

All our relationships, transactions, activities and behaviour are based on the **principles** of:

- ✓ **honesty,**
- ✓ **professionalism,**
- ✓ **transparency,**
- ✓ **sincerity,**
- ✓ **correctness,**
- ✓ **integrity,**
- ✓ compliance with the applicable regulatory framework in force, as well as the policies, procedures and instructions, etc. established/ issued by the Company and the Group.

As recipients of the Company's Code, which is a point of reference for all of us, we ought to perform our work/duties with utter professionalism, so as to contribute to achieving the goals of the Company and the Group, avoiding any decisions, behaviours and/or omissions that could come into conflict with the objectives and interests of the Company and the Group.

The Code and its values are a **point of reference** when managing internal and external relations, avoiding any conduct that could lead to violation of the principles set by the Company and the Group.

Human resources are fundamental to the existence of the Company, as well as to its development and success.

A key value of the Company and the Group is to foster the professionalism and skills of all employees, without distinction.

The quality of services must play a key role in the Company's corporate activities. **Professionalism, correctness, honesty, transparency and integrity** are core values to achieve the corporate targets.

The Company and the Group encourage fair competition, considering it important for their interests, the market interests, their customers, their debtors of claims under management and stakeholders in general.

3. General Principles

3.1. Respecting the Laws and Regulations in Force

All recipients of the Code we ought to comply with the laws and the regulations in force in all countries in which the Company and the Group operate.

All recipients, and mainly us, as Company staff, are required to know and comply with the applicable procedures, policies and instructions of the Company and the Group, especially those relating to the scope of our activities and our level of responsibility. In addition, we must be informed /monitor the applicable policies, guidelines, procedures, regulations etc. through the information mechanisms available at the Company and comply with them.

The Heads of all units are responsible for ensuring strict compliance with the regulatory framework applicable in the countries where the Company they work for operates.

3.2. Integrity

All relationships created on behalf of and for the benefit of the Company and the Group must be based on:

- ✓ good faith,
- ✓ honesty,
- ✓ ethics,
- ✓ integrity,
- ✓ transparency,
- ✓ correctness,
- ✓ impartiality.

In this context, it is strictly forbidden to change/alter any files in hard copy and/or electronic format, as well as any data and information related to any transaction in which the Company and/or the Group is involved.

3.3. Tone at the Top / All Senior Management Lead by Example

In doValue Greece, the senior executives, unit heads, supervisors (those with staff under their responsibility, regardless of their hierarchy level) and executives lead by example, by applying the provisions of the Code with diligence and dedication/ loyalty.

In addition, they have a duty to communicate, explain and inspire the features and culture of the Company in all employees under their responsibility, so that they become stakeholders and ambassadors of the values advocated by the Company and the Group.

Indicatively, need to:

- strengthen and promote respect and honest communication
- communicate the spirit of this Code and the policies/instructions/procedures of the Company and the Group to the letter, highlighting ethical and proper behaviour issues
- ensure understanding of the potential risks of each activity
- be an example and communicate with honesty and respect to customers, debtors,

- colleagues and associates, of Company
- respond quickly, consistently and reliably to complaints, comments and remarks from customers, debtors of claims under management, associates and staff of which they become aware
- safeguard the name and reputation of the Company and the Group.

3.4. Objectivity and Management of Conflicts of Interest (Conflict of Interest)

The Company employees and associates need to be aware, identify, manage and avoid situations that might give rise to a conflict of interest.

Conflict of interest may arise when our personal, business or financial interests deviate from the interests of the Company and/or the Group and/or key stakeholders (e.g. customers, debtors, shareholders, suppliers, etc.). These situations arise primarily during the conduct of the Company's operations, in the context of the management of claims, and when carrying out personal transactions of the Company's staff and associates.

Some indicative **situations of conflict of interest** are cases where a member of the Company's staff or an associate:

- May derive an inappropriate financial gain, or avoid a financial loss, at the expense of a customer or a debtor (whose claim it manages).
- has a different interest from the interest of the customer or debtor (whose claim it manages) as to the outcome of a service provided or of a transaction carried out on behalf of the customer or debtor.
- has a financial or other non-financial incentive in favor of the interests of another client / debtor or client/debtor group at the expense of the interests of the client / debtor , group of clients / debtor served.
- carries out the same business activity as the customer or debtor.
- receives or will receive from a person other than the client a consideration, in the form of money, goods or services beyond the usual fees or commission, relating to the service provided to the client.
- establishes a business relationship on behalf of the Company with a supplier that is a relative/family member or with whom the Staff member maintains a business relationship outside the Company.

In addition, at the Company and the Group, we recognize that the proper identification and handling of transactions between related parties enhances transparency, prevents conflicts of interest and ensures that the Company's and Group's financial statements and reports to the Regulatory Authorities contain the required disclosures, in accordance with the International Accounting Standards and the applicable regulatory framework.

All of us ought to:

- ✓ operate fairly and impartially,
- ✓ avoid situations that may give rise to a conflict of interest,
- ✓ avoid any situation that could affect the independence of our judgement and choice or is incompatible with our duties, in the context of full compliance with the applicable laws and regulations on conflict of interest.

The Unit responsible for monitoring, reporting and evaluating conflicts of interest is the Regulatory Compliance Unit, AML/CFT. In cases where a question or doubt arises regarding handling such a situation and its evaluation (existence of conflict of interest or not), the Company's staff must submit a written request to the abovementioned competent body of the Company, describing the characteristics of the particular case that may lead to a conflict of interest. In a similar case, the associates of the Company must address the Company bodies that are responsible for their relationship with it. Regarding the competence of the body to be approved, the approval teams described in the Company's current policies apply, including, but not limited to, the Conflict of Interest Policy, Relatives Policy, External Engagement Policy etc.

3.5. Protecting Personal Data

The protection of personal data is a primary concern for our Company. By personal data we mean any information relating to natural persons (debtors of claims under management, suppliers, associates, staff members, etc.), through which we can identify these persons.

All staff are tasked with expending every effort and exercising utmost diligence when collecting and processing personal data, in compliance with the internal policies, procedures and instructions of the Company and the Group, and in compliance with the applicable legislation on the protection of personal data.

In particular, staff ought to process personal data:

- which are necessary, relevant and the minimum possible to achieve the purpose of their task,
- in a lawful and transparent manner,
- ensuring that they are up-to-date, safe and accurate, immediately correcting any inaccuracies,
- for the necessary and legitimate time, safely deleting any data which is no longer necessary to be retained,
- in a way that guarantees their security, including their protection against unauthorised or unlawful processing and accidental loss, destruction or damage,
- for the sole purpose of carrying out the tasks/services assigned to them,
- using the information sources indicated to them by the Company,
- reporting immediately any incidents of personal data breach that may come to their attention to the head of their Unit and the Company's Help Desk.

To fulfil all the above, the staff ought to consult:

- the instructions and guidelines of the Company regarding the duties and responsibilities assigned to them based on their position and on Company's organisational model for the protection of personal data,
- the current notice on the processing of personal data of debtors, co-debtors, co-creditors, guarantors, etc., in accordance with Regulation (EU) 2016/679, Law 4624/2019, and the relevant Greek and European legislation, which is posted on the Company's website,
- the information on the processing of their personal data, as staff members, received from the Company and posted on the Company's intranet portal,

- the current policies, procedures and instructions of the Company and the Group regarding the protection of personal data.

The head of each organisational unit is solely responsible for ensuring compliance with the Company's and Group's existing policies, for providing proper and adequate information to the employees reporting to him/her, about the Company's policies and applicable legislation, and for implementing the Company's organisational model regarding personal data protection. In addition, he/she is responsible for ensuring that personal data processing in his/hers Unit is carried out exclusively by persons under his/hers control and only upon his/hers instructions.

Similarly, external associates (e.g. suppliers, service providers, etc.), provided they process personal data on behalf of the Company or the Group, ought to honour the commitments undertaken by them through partnership agreements, personal data processing agreements, confidentiality agreements and the security rules for data forwarded to them for processing. The Company cooperates with suppliers/service providers who guarantee the adoption of adequate, based on the standards of the Company and the Group, technical and organisational measures for the protection of personal data. Respectively the Company, as a data controller, processes the personal data of its associates' (suppliers) representatives, for the purpose of using the services of external associates in a transparent and lawful manner, as described on its website.

For issues related to the processing of personal data, staff and representatives of external associates may contact the Data Protection Officer at the Company's postal address or via email at dpo@doaluegreece.gr

The Company and the staff members take all appropriate organisational and technical steps to ensure data security and that data is safeguarded against any random or unlawful destruction, random loss, corruption, prohibited disclosure or access, or any other form of illegal processing. Lastly, as a data controller or processor, as the case may be, the Company shall ensure and demonstrate compliance with the provisions of the applicable legal and regulatory framework for every processing operation.

All personal data breaches, even alleged breaches, are reported directly to the Data Protection Officer (DPO).

Furthermore, note that the violation of the Company's policies/procedures/instructions and of the legislation on the protection of personal data may lead to the imposition of high administrative fines by the Personal Data Protection Authorities and to internal disciplinary or other sanctions.

If the information obtained by the staff and/or external associates during the course of their duties may be considered sensitive or privileged (inside) in accordance with the applicable regulations, the staff and external associates must follow the relevant/specific provisions (see the Company's respective procedures for managing inside information).

We ought to comply with applicable regulations regarding the security, protection and management of personal data.

3.6. Promoting Free and Fair Competition

Our Company understands the importance of the legal and regulatory framework on the protection of free competition and its benefits for consumers, competitors, as well as for the wider market.

We all ought to carry out our work in accordance with the laws and regulations in force for the protection of competition. It is forbidden to commit any act of intimidation (e.g. violence or threat) against competitors of the Company and the Group.

In addition, breaches of the free competition legal and regulatory framework may lead to heavy fines and reputational damage for Company and Group, as well as to administrative fines, penal sanctions and disciplinary sanctions for those natural persons liable for non-compliance with the competition rules and responsible for the violation. In case of dawn raid (surprise inspection), the Company must fully and actively cooperate with the competent authorities.

3.7. Protecting Intellectual Property

We recognise the importance of intellectual property in all its forms, be it copyright, trademarks, patents or other intangible property/ assets.

In particular, original works protected by copyright, whether owned by the Company and/or the Group or by third parties (including the software we use) may not be reproduced without proper authorisation.

It is also prohibited to use or modify, in any form or manner and for any purpose, original works and/or material protected by and/or associated with intellectual/industrial property rights, without the consent of right holders and/or those who have legal rights.

4. Criteria for Proper Decision-Making in our work place

The rules of the Code cover a wide variety of areas of our daily activities within the Company and the Group, highlight the points that shape our culture and become a valuable tool for making right decisions, even in cases where there is no specific reference in the Code.

To strengthen the personal responsibility of each member of our staff, we have established a set of criteria that define the correct manner, in accordance with the Code, for decision making on every issue we handle.. These rules are essentially a series of questions that are worth asking ourselves and answering in every case we face. Besides, all of us share the responsibility for safeguarding the reputation of our Company and Group.

Before making a decision, we should consider:

- Is it in accordance with the Code and Company and Group Policies?
- Is my decision legal?
- Do I feel it is right?
- What are the potential risks? Have they been assessed?

- Is there a potential for negative impact on me personally or on the Company?
- Am I certain that my decision will not raise trust or reputational issues for the Company?
- Would I be embarrassed if others were aware of my actions or decisions?
- How would I feel if it was posted on the media?
- What would a responsible person think?
- Can I sleep at night?

These are some indicative questions that, if answered in their entirety, may safely lead to a correct decision. In case of a negative answer, doubt or ambiguity, even in one question, we must interrupt the decision-making process and refer the matter to Company's competent bodies, Legal Counsel and Regulatory Compliance, AML/CFT Unit.

“Correct or Wrong Decision?”
Questions - Criteria that help us minimize our doubts.

5. Relationships with Customers and Debtors

5.1. Managing Contractual Relations with Customers and Debtors

Full satisfaction of customers and debtors needs is a priority for the Company and the Group, in order to create a strong relationship, possessed by honesty, courtesy, transparency and cooperation.

To this end, we undertake to disclose all the information, so that our customers/debtors fully understand the features and risks associated with the services provided, as well as the rights and obligations they undertake when signing agreements, avoiding any misleading action.

In addition, the Company and the Group adopt projects and initiatives to monitor and enhance/improve the services provided to customers/debtors, monitor their level of satisfaction through specific surveys etc.

It is prohibited in relations with customers/debtors to:

- offer members of companies - customers commercial opportunities or opportunities of any other kind that could, even potentially, give them an undue advantage to their benefit,
- submit incomplete documents and data and/or transmit false or modified / falsified data to customers/debtors,
- transmit or issue invoices or other documents of tax nature for customers/debtors to allow third parties to avoid income taxes or value-added taxes,
- behave in a misleading manner that could, even potentially lead to customers/debtors making mistakes in the technical-economic assessment of the products and services offered,
- use vague and non-transparent practices to force or influence the judgement or

behaviour of our customers/debtors.

5.2. Applying the Money-Laundering Legislation (AML/CFT)

The Company ensures strict adherence to the current legal and regulatory framework for the prevention and combating of money laundering and terrorist financing ("anti-money laundering"). As staff members, we must not assist or co-operate with any customer or debtor or supplier, while at the same time reporting to the competent bodies suspicious or unusual transactions that may come to our attention and which may be related to money laundering and terrorist financing.

Additionally, if we have sufficient suspicions that a customer, debtor or associate is involved in illegal activities relating to money laundering or terrorist financing, we must immediately notify the Regulatory Compliance, AML/CFT Unit in the ways indicated for this purpose (e.g. by phone, email, etc.).

It is strictly prohibited to engage in transactions with counterparties where there is even a suspicion that the money to be used may have derived from illegal or criminal activities or the counterparty is operating for money laundering purposes and/or committing terrorist acts.

To carry out any transaction, we ought to:

- check in advance all available information about the Company's counterparties
- comply with the applicable regulatory framework and policies, procedures and instructions established to check the origin of money used by counterparties to perform transactions
- avoid engaging in transactions that could help to launder money from illegal activities.

In accordance with the current regulatory framework for money laundering, implementing the above and taking appropriate measures in the event of a breach thereof also governs the activities of staff.

5.3. Following the International Regulations on Sanctions and Embargoes

The Company has developed policies, procedures and monitoring mechanisms to fully comply with the applicable legislative and regulatory framework for dealing with cases of violation of international regulations, by prohibiting, interrupting and identifying any transactions with an organisation/entity/country linked to terrorist activities, drug and arms trafficking.

5.4. We Give Priority to our Customers and Debtors, Respecting their Needs by Applying Transparency Principles

Honest and proper communication with both our customers and the debtors of the claims under management is a top priority for the Company. In this context, transparency in relationships with customers, debtors of claims under management, staff, shareholders and the society is of strategic importance.

The Company provides comprehensive information about its services to all its customers, while establishing procedures and following best governance practices. Compliance with the transparency rules by all of us helps our customers understand

the services we provide and leads to reliable and efficient collaborations and relationships of mutual trust.

At the same time, the Company provides equally to all debtors of claims under management comprehensive information on the proposed solutions for their debt settlement, offering clear, valid and detailed information, in accordance with the applicable legislation, so they may comprehend the features. At the same time, it establishes suitable and effective procedures, and follows best governance practices. When all of us comply with the rules on transparency of transactions, this contributes to the debtors receiving correct information and understanding the proposed solutions, which in turn establishes a climate of mutual trust.

In this context, the Company ensures the proper education, training and certification of its Staff, in order to respond with professionalism and excellence to the needs of the Company's customers and the debtors of claims under management, in accordance with the applicable legislation.

At the same time, it is not legitimate to use our capacity as members of the Staff or as associates and the information we possess to pursue personal benefit. As Company Staff, we must not participate in any transactions or provide Company services, in general, as counterparties, and especially as recipients of an asset/service or as authorised persons, so as to carry out a transaction on terms that are not available either to third parties or to other staff members. In case of doubt about actions falling under the above context, we must obtain Company's written position, by submitting a request to Regulatory Compliance, AML/CFT Unit at the following address:

CompliancePerso@doaluegreece.gr

5.5. Assessing Requests and CComplaints from Customers and Debtors

Our staff are responsible for forwarding for evaluation the requests and complaints from the debtors of claims under management. The purpose of this process is to enhance the quality of our relationship with debtors and to comply with the Company's regulatory obligations. Their cases must always be handled in a transparent, fair and timely manner, and in full compliance with the rules set out by the relevant provisions (Executive Committee Act No. 157/1/2.4.2019, Bank of Greece Governor's Act 2501/2002, as amended and in force, General Data Protection Regulation, etc.).

At the same time, the competent Company Staff should address in a timely manner the requests and complaints of the Company's customers, to safeguard the Company's response, the high level of its services and the continuous improvement of its procedures, and to promote a climate of mutual trust.

Both for assessing debtor and customer requests, as well as for fostering broader cooperation relationships with them, their customers, their suppliers and their staff, the Company follows anti-corruption policies, which the Company's associates must also follow, while, where necessary, it assists the competent authorities in carrying out relevant investigations.

6. Relations with Public Administration/Bodies/Authorities

6.1. General Principles

Our relations with public administration, public bodies and public officials are fully transparent and correct. These relations are exclusive to persons assigned/authorised to have them, due to their respective roles and in compliance with Company and Group procedures, policies etc. in force.

Company associates ought to also operate with appropriate mechanisms in place to monitor information disclosed to public administration/authorities.

The head of each unit (assigned with regularly contacting public administration/authorities) ought to display the appropriate conduct in relevant communications, but also provide their employees and associates with clear instructions as to their conduct in formal and informal interactions with public officials/officers, taking into account the particular features of their field of competence.

In case consultants or other Company associates are involved in relations with public administration/bodies, the same instructions given to Company staff apply. Furthermore, in its relations with public administration, the Company cannot be represented by a consultant or other associate if this could lead to conflict of interest.

When interacting and working with public bodies, any action that could be interpreted as favourable treatment is prohibited, as is any action that could be interpreted as withholding important information necessary to conduct negotiations or reach a final decision on concluding an agreement between the public body and the Company.

6.2. Managing Licensing Requests

During the Company's licensing procedures vis-à-vis public bodies, authorities etc., all stakeholders must act in good faith, with transparency and in compliance with the laws and regulations in force.

6.3. Managing Disputes and Resolution Agreements

When managing disputes and resolution agreements, all stakeholders must comply with the applicable laws and Company and Group procedures.

Stakeholders who are responsible for signing acts and documents must be specifically authorised to do so. During civil, penal and administrative lawsuits, any action (direct or indirect) that could favour or damage one of the stakeholders is prohibited.

6.4. Determining and Managing Contractual Relations

For every negotiation or contractual relationship between the Company and public administration etc. all stakeholders must act with transparency, comply with and uphold the laws, regulations, and Company and Group policies and procedures.

6.5. Managing Subsidies, Loans, Public Financing

When submitting requests to public administration/authorities, a State or body of the European Union for contributions, subsidies or loans, the persons involved in the relevant procedures must act with transparency, correctness and clarity, i strictly complying with the procedures and applicable regulations, using and submitting complete declarations and documents related to the activities for which said benefits can be properly and lawfully received.

It is strictly forbidden to use contributions, subsidies and loans intended for the Company through public administration for purposes other than those for which they were granted.

7. Relations with Supervisory Authorities and Other Audit Bodies

Relations with supervisory authorities and other audit bodies must comply with the principles of ethics, transparency and professionalism, so that the integrity and reputation of the Company and the Group are not undermined. It is prohibited to obstruct audit and supervisory activities in any way.

Staff members who receive requests for an undue advantage or suffer intimidation or harassment by the supervisory authority or the other audit bodies must report them immediately.

All persons involved in managing communications with the authorities and audit bodies, and when managing the audits they are subject to, must comply with applicable laws, internal rules etc. They must also act with transparency, honesty, responsibility and correctness, and they must be cooperative, providing clear, complete and objective information.

Specifically, those who receive requests for information or documents must act lawfully and correctly, ensuring their maximum availability and cooperation, and they must immediately prepare and submit the required regular and ad hoc reports (communications) to supervisory authorities and other audit bodies.

In any case, recipients are prohibited from implement / collaborate / cause any conduct that could be deemed unlawful and/or illicit per the regulatory framework governing Company and Group operations.

8. Determining Relations with Suppliers and Associates in general

By enacting policies and procedures, the Company and Group have taken special care, so that when entering into an agreement between the Company and a third party, the latter comply with Company's regulatory requirements and internal rules to avoid conflict of interest situations and safeguard Company and Group asset and information data.

The Company verifies the suitability, legitimacy and competence of the service provider in terms of its financial situation and its operating and control procedures to ensure

that the provider is able to provide the required level of service.

In particular, the Company does not take into account only the technical, financial and capital reliability of the provider, but also information that can guarantee their correctness, impartiality, quality, independent opinion, security, audit mechanisms and level of conduct when providing services. In general, it avoids relations with persons who do not meet Company and Group values.

Specifically, it is prohibited to have relations with persons who (based on available information) are involved in illegal activities (including the use of and cooperation with third country citizens who are in the country illegally, activities that favour money laundering or criminal activities).

Furthermore, the Company assesses the risks that may result from assigning services, establishes mechanisms to control risks and takes special measures in case it is found that the provider does not perform the assigned operations effectively and in compliance with the applicable laws and regulatory requirements.

In particular, the following rules of conduct apply with regard to the procurement of goods and services and the awarding of technical and physical security projects in the Company, to ensure transparency and objectivity and avoiding conflict of interest:

- Avoid transactions with suppliers who use practices that the Company considers non-transparent.
- It is not permitted to accept gifts, other than customary small-value gifts.
- Avoid any personal relationship that may affect or may be perceived as affecting the impartiality of Company employees.
- Ensuring confidentiality and the ethical, business and trading principles of the Company, the transparency of the procedures, the objectivity in the selection of suppliers and the protection of Company interests in general, requires the confidential treatment of the evaluation of the tenders throughout the tendering process, and after their completion and contract award.

The Code's principles are communicated to all suppliers, associates, consultants etc. of the Company so that they comply with them.

The Company's relations with suppliers or other third parties must be transparent, honest, based on accuracy, integrity, and respect of commercial confidentiality.

Under no circumstances can contractual relationships be established with persons or entities that are not willing to comply with these principles or that do not provide the appropriate guarantees with regard to meeting these requirements.

It is also prohibited to enter into any kind of agreement – directly or indirectly – with senior members or other persons performing administrative functions in private companies, with a view to unjustifiably promote the interests of the Company and/or the Group.

It goes without saying and it is non-negotiable that the Company shall terminate any relationship, if it finds that a supplier or associate follows unlawful or non-competitive

practices.

9. Managing Relations with the Media and the Market

The Company in its relations with the press and the media in general, fully applies the principles of transparency, accuracy, completeness and directness.

The communication and disclosure of news regarding the Company and the Group are carried out only by authorised persons who have deep knowledge of and follow the procedures adopted for these cases by the Company and the Group.

10.Preventing Instances of Bribery and Corruption and Promoting Integrity within the Business Environment

A primary commitment of the Company is to adhere to the highest ethical standards and show **zero tolerance** in cases of bribery and corruption. This commitment applies without saying to all Company staff and associates.

Therefore, staff members and members of our family are not allowed to receive gifts, rebates, fees or benefits, whether monetary or otherwise, from Company customers or from debtors or third parties in general for the services we provide or intend to provide, as staff members of the Company, as well as for services associated with our professional capacity. This restriction also applies to gift-offering attempts, as well as to all Company associates, who must ensure that all their staff comply with them.

Note that it is not prohibited to accept small, symbolic gifts offered in the context of common courtesy and communication between staff and clients/suppliers or debtors, provided they are common practice and remain reasonable and acceptable, as well as legal and properly recorded.

In particular, regarding gifts that fall under the “hospitality/entertainment” category, the recipient should inform their unit’s manager as well as the Company’s Regulatory Compliance, AML/CFT Unit or People Department. Gifts that are beyond those that are considered as symbolic/customary should be reported by the recipients to their immediate supervisor and the Regulatory Compliance, AML/CFT Unit. In the event of an attempt to offer gifts (other than symbolic/customary) or in cases of doubt as to whether to accept a gift or not, we must seek advice from the Regulatory Compliance, AML/CFT Unit.

10.1. Managing Gifts and Entertainment Expenses

Furthermore, in the context of business relations, gifts are offered only to promote the Company and/or Group image and cannot/must not be construed as going beyond accepted commercial practice or common courtesy, or as a means used to receive favourable treatment in the performance of any process and/or activity that may be connected with the Company and/or the Group.

Gifts may be offered or accepted only if they are of medium value, are customary in business relations and are not connected to any kind of requests that might jeopardise

autonomous thinking and operational correctness.

10.2. Displaying Social Responsibility

Corporate Social Responsibility (CSR) is a fundamental and integral element of our strategy. Operating with sensitivity, respect and a high sense of responsibility, we try to actively contribute to improving the financial and social environment we are part of and active in. In this context, we support various public service initiatives, with the approval of the Company's Communication Committee. Using CSR actions for communication purposes conforms with the principles and overall profile of the Company, giving off quality, leadership, substance, respect and discretion.

Having a structured strategic plan for CSR, we carry out targeted actions for the benefit of vulnerable social groups, as well as initiatives promoting green and sustainable development.

At the same time, the Company contributes every year to a number of non-profit organisations and foundations with donations and volunteer work.

Donations made by the Company cannot be used to obtain an illegal benefit; except for the promotion of the Company and Group name.

The Company responds to requests for contributions exclusively from entities and associations which have been registered as non-profit and have articles of association, and have high cultural or charity value.

Grants, contributions to charitable purposes and donations are allowed subject to the laws and regulations in force. Any grant, contribution and donation that could jeopardise the integrity and reputation of the Company is prohibited.

Grants and collaborations are limited to events that guarantee quality, originality and effectiveness. In any case, special attention must be given to avoid creating conflict of interest during these actions.

All payments made for sponsorships, collaborations, donations and charitable purposes must be monitored by the competent departments, recorded and kept in Company books and accounts for full transparency.

11. Managing Corporate Obligations and Inside Information

11.1. Applying Group Policies/Guidelines regarding Inside Information

We ought to protect and keep confidential any inside information we may obtain and avoid inappropriate and unauthorised use. We must also comply with the provisions of the applicable Company and Group policies and guidelines regarding market abuse, insider dealing, management of inside information, disclosing such information and keeping records.

Aiming to ensure the confidentiality of the information assigned by investors/customers

to the Company, as well as the objective and equal treatment, a system of Chinese Walls is implemented, which not only applies to company information systems, but also extend to the physical separation of critical units, e.g. units responsible for communication with debtors (RMs, account officers, advisors etc.), in order to ensure that simultaneous management of competitive information is avoided.

Furthermore, in full compliance with the current regulatory framework, the Company has established and applies a series of measures to manage, protect and separately store information. In this context, it allows access only to authorised parties, safeguarding confidentiality, integrity and proper disclosure (avoiding selective disclosure of documents and information, e.g. early release to specific recipients, such as investors, journalists, analysts etc.) or disclosure in an untimely, incomplete or insufficient way which could lead to asymmetric information.

11.2. Preventing Activities that Lead to Market Abuse

Of primary concern to the Company is to prevent its staff from engaging in activities that may lead to market abuse, in violation of the legal and regulatory framework in force. Specifically, all people working in the Company, as well as persons closely associated with staff members, are not allowed to engage in market abuse, according to Regulation 596/2014 and its implementation decisions, and in particular to:

- I. engage or attempt to engage in insider dealing
- II. recommend to another person to engage in insider dealing or induce another person to engage in insider dealing
- III. use recommendations or inducements of others, where we know or ought to know that the recommendation or inducement is based on insider information, unlawful disclosure of inside information, market manipulation, or attempt to engage in market manipulation

11.3. Managing Financial Information and Reports

The Company applies high standards to maintain accurate, correct and complete financial information and reports, and ensures transparency in its financial reporting. Financial statements are compiled and published according to the Greek legislation and International Financial Reporting Standards.

When carrying out Company activities and audits, stakeholders must cooperate to ensure compliance with applicable laws and internal procedures, as well as the correct and accurate management of accounting and financial data.

Staff members who are also responsible for administrative/accounting functions must make sure that every process and transaction is legal, consistent, compliant, authorised and verifiable, using the procedures adopted to this end.

It is also strictly prohibited to conceal or destroy, in whole or in part, account entries or documents that need to be stored, and to engage in any other conduct that would not allow the transparent reproduction of assets and liabilities for tax purposes.

Stakeholders carry out their activities in compliance with the tax regulations in force and according to the instructions provided by the competent tax authorities.

Stakeholders involved in preparing financial/tax obligations, including the correct and swift payment of direct (e.g. company tax) and indirect (e.g. VAT) tax obligations, must:

- report true, transparent assets and liabilities, consistent with the actual data of the Company in the tax statements or the VAT statements; allow the Financial Services Division to correctly reproduce the Company's revenue and sales information,
- submit tax statements, VAT statements and any substitute tax statements in compliance with the provisions and time frame set out in relevant laws,
- pay the tax amounts due, using only compensation for due or actual credit.

11.4. Corporate Communication

Staff participating in the preparation of financial statements, reports, statements and corporate communications intended for shareholders, the public, creditors or the market must act with integrity and honesty, ensuring the completeness, transparency and clarity of the information and data provided, in full compliance with the regulatory framework in force (e.g. civil code etc.).

11.5. Relations with Shareholders and Other Corporate Bodies

As far as Company shareholders are concerned, the Company is committed to maintaining relations with the following features:

- respecting their rights, always acting according to the laws and regulations in force
- generating profit for their investment, while always remaining in line with values and ethical standards
- acting with transparency, providing timely and accurate information
- informing about the issue of new policies or changes affecting current strategy
- Consistently, aiming to promote their long-term interests
- acting according to the best corporate governance practices
- applying an effective internal control system by developing strong Regulatory Compliance and Internal Audit operations

Relations with shareholders and other corporate and control bodies (e.g. Board of Directors, Supervisory bodies etc.) are based on the principles and rules of this Code.

Requests for information, documents etc. from shareholders or corporate and supervisory bodies are satisfied immediately and the information provided is prompt, true, complete, detailed and accurate.

The same criteria and principles apply to relations with other bodies, such as rating companies etc.

11.6. Preserving Professional Confidentiality and Protecting Business, Professional and Banking Secrecy

Staff and associates are committed to safeguarding the confidentiality of information acquired in the performance of their duties, preventing third-party transfer, disclosure or access. The obligation to preserve confidentiality is explicit and absolute (legislation

on business, professional and banking secrecy and data protection laws). Third party is considered to be any person who is not legally entitled to know the above information. Third parties also include all staff members and Company associates whose access to such information is not required for the performance of their duties. Confidential information means information that has not been disclosed or is not available to the public (including know-how, financial data, administrative and legal procedures, agreements, information concerning the development, operation, organisation and strategy of the Company, information concerning intellectual property rights, lists of clients/associates/suppliers etc., policies, procedures, standards, specifications, instructions, techniques, methods, plans, charts, data, files on persons or things, samples) or falls under banking, professional, commercial or industrial secrecy (information relating to debt and debtors).

Note that executing searches on accounts and debtor and/or client data through the central and peripheral systems of the Company or a credit or financial institution that has assigned credit servicing to the Company, as well as through the inter-bank information systems (e.g. TIRESIAS) outside the context and not in connection to the exercise of one's duties and tasks is unethical and illegal and is also considered a violation of this Code. Company staff and associates must not use confidential information for personal benefit or for the benefit of third parties. They must respect confidentiality, avoiding disclosure of confidential information in the family, social or other environment, including social media, and take reasonable measures to protect physical records and portable electronic storage units.

Maintaining security and confidentiality of information during operations carried out by staff and associates – both in-house and through teleworking – is achieved by adopting the principles and rules reflected in Company policies and procedures. These can be summed as follows:

- Carry out operations from spaces that ensure adequate information-security conditions
- Lock devices containing information in electronic format and physical files when leaving
- Use secure Wi-Fi networks, not public, with the most up-to-date security settings configuration
- Use only corporate email accounts to send emails (you are prohibited to use free private accounts available free-of-charge e.g. Gmail, iCloud, Hotmail etc.)
- Keep access codes secret

Finally, it is important to be aware that the obligations of professional confidentiality and business, professional and banking secrecy survive even after our departure from the Company/Group or our termination the business relationship.

12. Managing and Protecting Human Resources, Corporate Assets and the Environment

12.1. With Dignity and High Standards of Professionalism in our Workplace

Mutual respect and dignity are our core priorities. Each of us must show respect towards the Company, its clients and debtors, as well as those with whom we cooperate. Diligence in our work, professionalism, honesty, integrity, impartiality, fair and quality treatment for our clients and debtors defend the interests of the Company in the most effective way, and ensure our excellence as professionals and people. Professional conduct includes professional attire, adhering to working hours, as well as limiting personal communication, phone or electronic, during working hours.

Within its sphere of influence, the Company is committed to ensuring respect for human rights, and in particular among staff members, suppliers, clients and debtors.

The Company adopts policies to counter violence - harassment in the workplace with a view to safeguarding the rights of staff members and shows zero tolerance to all forms of discrimination, violence, harassment or intimidation relating to ethnicity, gender, motherhood, colour, religion, health, sexual preference and any other distinction, as such behaviours are incompatible with our culture and values. To this end, we have established communication channels and processes through which any incident or suspected incident of discrimination, harassment or intimidation can be reported, examined and addressed.

All staff members are encouraged to raise issues of concern and speak up when they suspect potential wrongdoing or are faced with conduct or situations that may raise ethical, legal or regulatory concerns.

On its part, the Company is committed to providing equal employment and development opportunities, treating fairly, meritorious and objectively every staff member.

If you believe that you or someone else is a victim of harassment or discrimination, you can refer the matter to your line manager, the People Department, as well as to other communication channels as described in the policy in force for reporting unethical conduct.

Specifically, you may:

- Contact the Head of the Internal Audit Unit or the Head of the Regulatory Compliance, AML/CFT Unit
- Send an email to EthicsHotline@dovaluegreece.gr
- Submit a written report to the Internal Audit Unit or the Regulatory Compliance, AML/CFT Unit
- Use the anonymous phone line (+302104847620 ext. 47620) to talk with an authorised executive of the Regulatory Compliance, AML/CFT Unit or leave a message on the answering machine

In any case, when encountering difficult situations in the performance of our duties, it is recommended to seek advice and/or guidance from management or directly from the Regulatory Compliance, AML/CFT Unit.

We must be aware that each one of us is individually responsible for strengthening our working environment and promoting an inclusive workplace, creating an environment where there is no discrimination, intimidation and rudeness, and where respect, inclusion, solidarity, understanding, honesty and meritocracy prevail.

Dignity and respect are essential elements of our behaviour in our workplace, where discrimination, harassment, rudeness and intimidation have no place.

12.2. Selecting and Managing Human Resources

When searching and selecting personnel, the Company adopts criteria of objectivity, competence and professionalism, applying the equal opportunity principle without nepotism (favouritism), ensuring both compliance with the applicable regulatory framework and human resources with the best competencies available in the market.

The Company hires staff with a residence permit covering the entire duration of employment (for persons who are not from EU countries).

Furthermore, it protects the ethical and physical integrity of its staff, providing working conditions that respect personal dignity, creating a safe and healthy workplace, promoting the development of its resources to improve and increase its corporate capital, and the development of staff professionalism and their skills. It is prohibited to engage in any activity that may involve exploitation or subjugation of any person, any form of child labour and the submission of employees to poor working conditions and poor supervision.

12.3. With Optimal Levels of Health and Safety

One of the most important priorities for the Company and for us as staff is to ensure our physical and mental health and safety in the workplace. That is why, in addition and above legislation, all necessary measures are taken to prevent and deal with accidents and illnesses.

The Company assesses health and safety risks at work and establish relevant management measures. To this end, it also assesses the special biological risk of transmission, according to the measures specified/issued by the competent local, national and international bodies.

Specifically, Company:

- implements programs to ensure a safe workplace and prevent risks associated with health and safety
- possesses the appropriate infrastructure and equipment that is needed for a safe working environment

- trains and informs the members of the staff regarding health and safety issues.

Additionally, we as staff members, must comply with the applicable health and safety regulations (laws, regulations, instructions, guidelines etc.) and abstain from incautious and negligent behaviour or from acting in a way that could harm our physical or mental condition and/or others or that could even cause such incidents. We must also take care of both our own health and safety and that of our colleagues at the workplace, who could be affected by our actions or omissions.

12.4. Our Environmental Responsibility

Considering environmental protection a priority and recognizing the environmental impact of our own operations, the Company follows a responsible environmental behaviour in its daily operations.

Additionally, we must fully and truly comply with the applicable environmental laws and regulations.

Furthermore, we must carefully assess the environmental consequences of our choices when performing our duties, relating both to resource consumption and waste production which are directly related to our jobs (direct impact) and to actions and behaviours that we do not directly control and implemented by third parties with whom we have relationships: customers, debtors and suppliers .

12.5. Our Attitude towards Company assets

We protect Company's assets irrespective of our mode of work (on-site presence, teleworking etc.). Company assets include, but are not limited to, buildings and fixed assets (e.g. any type of machinery, computers, desks, drawers, filing cabinets, lockers, archives and any equipment used in general by staff in performing their daily duties), software, communication networks, procedures, elements of corporate identity, information, customer and debtor base, supplier information, reports, regulatory documents, files and consumables. Concerning means of communication available to staff, note that every medium of communication using a Company electronic address, network, and mail or using Company workspace should only be used for professional/business purposes. For all these assets, we must demonstrate due care and responsibility in safeguarding the integrity, so as to properly serve the business purposes of our Company.

In addition, we must be aware that Company's assets should not be used for personal benefit and that any concern regarding their proper use should be reported to the line manager or to the competent security officer.

Access to Company assets is granted to internal audit bodies and/or external bodies (e.g. during an audit for maintaining resource and user security etc.) in the context of their duties, while every invention, discovery, development, idea, process or work relating to the business activity of the Company belongs to the latter.

Note that if there is any reason to believe that the information system or network security has been breached, in case of loss of equipment such as laptop, mobile etc., or if we think that our passwords and/or data have been compromised, we must report the incident to the Information Security Unit (informationsecurity@doaluegreece.gr).

12.6. Following a Business Continuity Plan

The Company has developed a Strategic Business Continuity Plan (BCP), which is in full compliance with the provisions of the relevant legislation and international standards.

Its main goal is to protect the life and safety of staff, provide uninterrupted service of our critical tasks and services to our clients and debtors, and safeguard our reputation and our property. The Company has carried out a thorough analysis of its operations, ensuring an assessment of emerging risks, and develops strategies to address issues that may affect its day-to-day operations.

It goes without saying that we all comply with, participate in and follow closely directives aimed at the Company's business continuity.

13. Employee Relations / Our obligations

13.1. We Communicate Openly and we have a Duty to Report Dishonest and Irregular Behavior

Our Company operates on the basis of high standards of ethics, integrity, transparency and accountability. Our strategic commitment is to safeguard our reputation and clientele, both on a company and group level.

For this reason, it is of primary concern for staff and associates to act with honesty, a high sense of responsibility, and to ensure they safeguard the assets and resources they are responsible for. To this end, we apply the **rule of zero tolerance** in cases of fraud, bribery, corruption, violation of legislation related to money-laundering and actions in general that may damage the property or reputation of the Company and/or the Group. All unit heads must ensure a work environment that creates security for staff members, to communicate freely and to report any issues that may come to their attention. Likewise, the Company's associates should also be encouraged to report such issues.

In any event, the staff and associates can contact the competent bodies stating facts or circumstances that may constitute indicatively and not limited to:

- violation of the legislation or other regulations
- violation of the Code of Conduct and Ethics
- violation of policies/instructions issued by the Company and/or the Group
- other forms of illegal, irregular, dishonest, unprofessional or unethical behaviour, including but not limited to:
 - theft
 - embezzlement
 - bribery and corruption
 - conflict of interest

- money laundering and terrorist financing
- misappropriation/destruction of assets
- misuse of confidential information
- ethical / psychological / physical / sexual harassment
- fraud attempts
- transactions or conduct that can be interpreted as indications of fraud or attempt to commit fraud.

The Company provides protection against reprisal and keeps confidential the identity of those who have submitted information they know and consider to be accurate and true. However, malicious reports are not subject to protection and confidentiality, and are considered to be unethical.

Reports for such incidents may be submitted:

- ✓ via email to: EthicsHotline@dovaluegreece.gr
- ✓ or over the phone: **+30 2104847620**

The extensive list of alternative reporting channels are described in detail in the relevant policy for reporting unethical conduct. The Company's associates may additionally address the Company's body which is responsible for their relationship with the Company.

13.2. What Applies for Our External Employment

With regard to potential employment outside the Company, it is expected that we must avoid any involvement in activities that could create a conflict of interest or in any way compromise the integrity and reputation of the Company. In addition, we must ensure that any possible external employment does not affect our ability to perform our duties as derived from our contract as employees.

We must remember that conflict of interest may arise from our professional and personal activities, when our actions and our personal interests impede or may hinder the performance of our duties in an impartial and effective manner.

In case we may engage in activities outside the Company, we must notify the Company in advance in writing, if our activity falls under the following categories/conditions:

- acquire any significant interest in any external business or enterprise .
- undertake any obligation for an external business or business enterprise
- perform a remunerated activity, directly or indirectly, on our own behalf or on behalf of another natural or legal person.
- undertake employment, either on a remunerated or non-remunerated basis , for companies engaged in commercial or other for-profit activity.
- we are offered board member positions in public or private held companies.
- we are offered significant financial or other interest in aa supplier, customer, debtor of a claim under management or a competitor of the Company.

Any activities outside the Company must be notified in writing to our direct supervisor, the People Department and the Regulatory Compliance, AML/CFT Unit.

Especially, lawyers employed as Legal Counsels of the Company must, at the end of each calendar year, submit to the Regulatory Compliance, AML/CFT Unit a statement that no conflict of interest has been identified in handling cases of clients and/or debtors of claims under management and/or a member of the Company's staff that they may have undertaken during that year.

13.3. Implementing a Relatives' Employment Policy

The Company's intention is to ensure meritocracy and avoid creating conflicts of interest when recruiting, promoting and transferring family members. In this context, it is established that staff members who are family members may not be placed in positions whereby one may in any way control, evaluate, examine, approve or determine the work performed by the other or affect the salary development and promotion of the other.

Always keep in mind that a conflict of interest may arise in cases where the personal interest of one or more Company employees takes precedence over the interests of the Company.

13.4. Participating Responsibly in Social, Political, Voluntary Activities

As staff members, we belong to an organization that encourages our participation in charitable and social activities, and welcomes volunteering, without requiring any approval or notification for these activities. In any case, however, we must act responsibly so as to avoid any adverse effects on our daily duties. Our staff members are encouraged to discuss with their immediate supervisor any concerns relating to the impact of such activities.

Our staff members have a self-evident right to participate in political activities, such as participation in Local Government Authorities or undertaking specific tasks in a political party. However, such engagement should be conducted explicitly in a personal context, without any reference or association with the Company. Furthermore, undertaking a public position should not create a conflict of interest or hinder the performance of our duties.

Any acceptance of any government position is subject to the provisions relating to external engagement and must be notified in writing to our direct supervisor, the People Department and the Regulatory Compliance, AML/CFT Unit.

13.5. What Applies to Our Transactions

13.5.1. For Favourable Staff Benefits

We work for a Company that offers us a range of benefits, including favourable terms for services and products provided by the Company. As employees, we ought to make sure that we use those in a proper and fair manner.

13.5.2. For Our Bank Accounts

If deemed necessary in the context of a regular or extraordinary audit, we must submit copies of our bank account statements and of relevant transactions to the Company's Auditing Bodies.

13.5.3. For Borrowing

Our staff members need to pay particular attention in their exposure to loan obligations, either as debtors or as guarantors. Needless to note that excessive borrowing is not allowed and staff members must display prudent and consistent behaviour with regard to their debt burden.

13.5.4. For Our Claim Settlement

Staff members need to pay special attention to compliance with the rules on preventing conflict of interest when they or their spouses or their relatives (up to 4th degree by blood or up to 3rd degree by marriage) are debtors, co-debtors, guarantors or third-party collateral providers, on claims managed by the Company. In any case that a staff member or their spouse or relative (as described above) is involved in any of the above situations with a claim under managed by the Company, he/she should notify immediately to his/her supervisor. Staff members must display prudent and consistent behaviour regarding the settlement of their debts managed by the Company, and it is understood that they are not allowed to exploit their capacity as staff members of the Company for this purpose. In such cases, staff members are not allowed to carry out any action in respect of such debts through the Company's central or peripheral systems to which they have access for the purposes of their work, but should address the Company's official channels that provide services to debtors of claims under management.

Similar restrictions and obligations apply to all Company's associates, who must also ensure that they are respected by their staff.

Respectively, in order for a staff member to be authorized by a client or a debtor of a claim under management (other than the grade of family referred to above) , prior authorisation from the Regulatory Compliance , AML/CFT Unit is required, following the approval of his/her direct supervisor , unless such authorisation is part of a Company's relevant policy and procedure, followed for all portfolio debtors.

13.5.5. For Our Participation in Judicial or Extrajudicial Cases

When we are called or voluntarily decide to attend as witnesses in cases of clients, associates, members or former members of staff, and debtors of claims under management, either in court proceedings or in out-of-court settlements, we must not take any action before notifying and contacting the Legal Counsel and the Regulatory Compliance, AML/CFT Unit.

13.5.6. For Participation in Auctions

We are not allowed to, directly or indirectly (through surrogate persons), participate in auctions for the sale of movable or immovable assets belonging to debtors of claims under management, or participate in any relevant action that could lead to an adverse consequences or adverse impact on the reliability and reputation of the Company, or/and the Group or its customers. This prohibition does not include cases in which the Company invites the staff to participate in the process as an interested party, in accordance s with the applicable procedures of the Company's competent unit. In

particular, for those staff members employed in units involved in the servicing of debts or service the relevant assets, the prior approval of the Unit's manager along with a notification to the Regulatory Compliance, AML/CFT Unit is required.

13.6. We Avoid Participation and Dependence in Gambling Activities

Developing a specific corporate culture and identity may impact on various aspects of our individual activity. Especially when each and every member of our staff is required to act as a model of professionalism, integrity and mature personality, and avoid behaviours that reflect dependences and cause great concern to the Company.

For these reasons we should refrain from personal activities that are seriously hinder the smooth performance of our duties.

In particular, our systematic participation in gambling with the purpose of obtaining a financial reward is prohibited and constitutes a misconduct that is subject to administrative sanctions.

13.7. Our Activity on Social Media

The Company recognises our need to participate in social media, the right to maintain personal accounts and to freely share our views on the respective topics. However, it is recommended that we use them in a responsible and proper manner, in accordance with the applicable legal framework and the relevant regulatory framework. It is worth remembering that we:

13.7.1. Do Not Reveal Information Relating to Company

Information Security is our main priority and we are obliged to preserve as confidential or internal the information about our customers, debtors of claims under management, our strategy, our colleagues and suppliers, as well as documents circulated on our intranet, such as Management Acts, Announcements, etc.

13.7.2. Do Not Make Posts or Comments about the Company

Only certain employees are authorised to represent the Company in public, therefore any views we express is our personal opinion and not related in any way to our position in the Company. Also, we do not comment on issues about Company, which require legal support (unless we have a relevant authorization).

13.7.3. Ensure that our Imprint and Communication Style are Compatible with the Company's Principles

We manage the content of our posts in a responsible manner, acknowledging that it remains visible to a wide audience for a long time. We respect our audience, copyrights, the privacy of third parties, make no petitions without the prior approval of individuals concerned (especially customers, debtors of claims under management and associates), we do not use obscenities, intimidate, defame or insult any social groups. In general, we avoid obscene personal posts that are not consistent with the profile of

our employees.

13.7.4. Comply with Our Obligations to the Company

We follow the terms of our employment contract, especially those relating to Confidentiality, Secrecy, Representation, and the rules of this Code, even when using Social Media in our leisure time.

13.7.5. Act responsibly Rven when we have the best of intentions

Anything we publish about the Company may potentially harm it, also harming us personally. When we post material related to the Company, we hold its communication image in our hands and we must act so that the Company and ourselves can only reap benefits from the digital presence.

Moreover, it is straight-forward that using social media within the workplace is permissible, solely for work purposes. The personal use of Social Media should take place outside working hours, so as not to affect the daily work activity.

In general, we should remember that our obligation not to disclose information about the Company and the Group, and not to comment on the Company and the Group, applies not only to our participation in social media, but also to other posts, photos, press communications, public speeches, etc. We also do not use the Company's logo or promotional material and we do not refer to competition.

14. Governance of the Code of Conduct and Ethics

14.1. Bodies and Monitoring of the Code of Conduct and Ethics

This Code and any revision thereof shall be approved by decision of the Board of Directors of the Company.

Regulatory Compliance, AML/CFT Unit of the Company, in cooperation with the People department, and the Ethics Committee are responsible for monitoring the Code. In this context, they are entitled to process, for the purpose of safeguarding the legitimate interests of the Company, all necessary and relevant personal information available in computer systems, electronic work communications etc. Their purpose is to serve and support the rules described, to defend Company's interests and to fulfil its obligations, as provided for by the applicable legislation.

The persons responsible for monitoring the implementation of this Code shall take appropriate, organisational and technical measures for data security and protection. This achieves the appropriate level of security for the nature of the data being processed. Also, with high security measures and means, information is provided to authorized third parties (e.g. Public Prosecutor's Offices, Bank of Greece, Tax Authorities etc.) when requested.

“The Regulatory Compliance, AML/CFT Unit and the competent audit bodies of the Company are responsible for monitoring and implementing the Code of Conduct and Ethics. Every action is performed legally, with the highest levels of information and data security.”

14.2. Distribution and Training

The Company ensures that the Code is distributed to all recipients (see definitions).

The Code shall be disclosed through:

- specific communication when the (professional) relationship begins;
- internal communication issued at the time of its first approval and subsequently when revised;
- publishing it on the Company’s intranet.

Furthermore, the Group’s Code of Conduct is also distributed to all external bodies (associates, suppliers etc.) by posting it on the websites of the Company and the Group, as well as through its disclosure and the acceptance of its principles when establishing the relevant relationships.

Regulatory Compliance, AML/CFT Unit is also responsible for handling questions that may arise, as well as for our periodical training activities in order to disseminate the contents of the Code and the system of procedures and internal controls allowing its implementation.

14.3. Reporting Possible Breaches

Any violations of the provisions of this Code (and/or applicable procedures and policies etc.) may be referred to the competent bodies of the Company, as provided in the relevant applicable policies of the Company and/or the Group.

Anyone becoming aware of any violations or situations that could potentially lead to non-compliance with the provisions of this Code (and/or applicable procedures, policies, regulations etc.) must immediately inform the Company’s competent bodies.

Reports may be submitted in the following ways:

- anonymously, in writing, by post to the following address:
doValue Greece
27 Kyrou and Archimidous Streets
Attention: Chief of Business and Regulatory Compliance, AML/CFT Unit
- by email to:
EthicsHotline@dovaluegreece.gr
- Over the phone on: +30 210 4847620
- Contacting the Chief of Business and Regulatory Compliance, AML/CFT Unit
- Contacting the Head of Internal Audit

All reports are managed according to the applicable processes and policies on reporting unethical conduct, which the Company has adopted.

Any form of retaliation against the persons submitting a report (whistleblowers) is forbidden.

14.4. Sanction System

Compliance with the principles and provisions of this Code is an essential part of the contractual obligations of all persons (recipients).

Any perceived violations of the provisions may be referred to the competent bodies of the Company and can even lead to the termination of the relationship with the Company or to legal consequences or claims for compensation for any damage caused to the Company etc.

Any sanctions are applied according to the principle of proportionality with respect to the seriousness of the breach.

14.5. Duration and Revision of the Code of Conduct and Ethics

The Code shall be reviewed whenever there is deemed necessary. The Regulatory Compliance, AML/CFT Unit is responsible for review it, and undertakes to ensure that its content and rules are fully adapted to any amendments in the applicable legislative/regulatory framework and/or following the Company's and Group's principles.

14.6. Our Personal Commitment to Professional Responsibility

On an annual basis, we confirm that we are aware of the provisions of the Code. The general issues discussed in this Code are specified by Policies, Guidelines and Procedures issued by the competent Business Units, posted on our intranet or distributed by email or by any other means deemed appropriate by the Company. This increases the knowledge of our staff about the procedures in place, which we all must learn and be aware of.

Indicatively but not exclusively, we must be aware of:

- ✓ Management of Complaints Procedure
- ✓ Personal Data Protection policy
- ✓ Reporting Unethical Conduct Policy
- ✓ Conflict of Interest policy
- ✓ Relatives Policy Outsourcing policy
- ✓ Procurement policy
- ✓ Managing Personal Data Breaches Policy
- ✓ External Engagement Policy
- ✓ Anti - money laundering and combatting the financing of terrorism Policy
- ✓ Group Market Abuse Policy
- ✓ Group policy for the Management of Related Party Transactions and of Transactions in Conflict of Interest of the doValue Group
- ✓ doValue S.p.A Anti-Corruption policy

14.7. Contact Information

For any issue relating to the provisions of this Code, as well as for submitting approval requests, notifications when required the following email is available:

CompliancePerso@dovaluegreece.gr

15. Terminology and Examples

“Stakeholders”:

All persons who directly or indirectly come into contact with the Company, such as shareholders, employees, associates, customers, suppliers, as well as Authorities to which the Company reports.

“Insider Dealing”:

It is a form of market abuse and arises when a person possesses inside information and uses this information:

1. to acquire or dispose of, for its own account or for the account of a third party, directly or indirectly, financial instruments to which that information relates; or
2. to cancel or amend an order concerning a financial instrument to which the information relates, where the order placed before the person concerned possessed the inside information.

Recommending that another person engage in Insider Dealing, or inducing another person to engage in Insider Dealing, arises where the person possesses inside information and recommends, on the basis of that information, that another person:

1. acquire or dispose of financial instruments to which that information relates or
2. cancel or amend an order concerning a financial instrument to which that information relates, or induces that person to make such an acquisition, disposal, cancellation or amendment.

The use of the recommendations or inducements referred to above amounts to insider dealing where the person using the recommendation or inducement knows or ought to know that it is based upon inside information

“Owner of inside information”:

Any person who possesses inside information as a result of:

- a) being a member of the administrative, management or supervisory bodies of the issuer;
- b) having a holding in the capital of the issuer;
- c) having access to the information through the exercise of his/her employment or duties (including and not exhaustively: managers, financial analysts .any person receiving information on the strategic decisions of the Company and/or the Group which may have a positive or negative impact on the financial markets, the internal and external auditors of the Company and/or the Group, as well as any person who, due to their work/assignment , is being informed about subjects related to financial instruments that will be or are listed on a regulated market or MTF or OTF).

In any case, it is meant the person who possesses inside information under circumstances other than those referred above, where that person knows or should have known that it is inside information. Where the person is a legal person, the above definition includes the natural persons who participate in the decision to carry out the acquisition, disposal, cancellation or amendment of an order for the account of the legal person.

“Multilateral Trading Facility” or “MTF”:

A multilateral system operated by an investment firm or a market operator which brings together multiple third-party buying and selling interests in financial instruments — in the system and in accordance with non-discretionary rules — in a way that results in a contract.

“Organised Trading Facility” or “OTF”:

A multilateral system, other than a regulated market or MTF, in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances and derivatives instruments may interact in the system in a way that results in the contract.

“Unlawful disclosure of inside information”:

Unlawful disclosure of inside information occurs when a person possesses inside information and discloses that information to any other person, unless the disclosure made in the normal exercise of the person’s employment duties.

“Inside information”:

Information relating, directly or indirectly, to one or more issuers or to one or more financial instruments and:

- is of a precise nature,
- has not been made public; and which
- if it were made public, it would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments.

Categories of persons possessing inside information include:

- Persons involved in decision making and implementation or who have access to information on strategic issues (Strategic Actions Insiders)
- Persons involved or have access to financial information during the preparation of the Financial Results (Financial Results Insiders)
- Persons who in any way are involved in individual events which include inside information issues. (Other Ad hoc Insiders)

“Staff” consider:

- All Members of the Board of Directors
- All senior executives/ managers
- All persons engaged in advisory positions
- All persons engaged as full-time, part-time and temporary employees
- All persons engaged by the Company on a contract basis (third parties collaborating with the Company to provide certain services or complete a project)
- The Company’s representatives and in general all persons authorised by the Company

“Person discharging managerial responsibilities” means a person within an issuer who is:

- a. a member of the Board of Directors or of Management or or supervisory body of that entity; or

- b. a senior executive who is not a member of the bodies referred to under point (a), who has regular access to inside information directly or indirectly related to the entity, and power to make managerial decisions affecting the entity's future developments and business prospects.

“Person closely related to the person discharging managerial responsibilities” means one of the following:

- a. the spouse or partner who, under national legislation, is treated as a spouse
- b. the dependent children, in accordance with national legislation
- c. a relative who, has shared the same household for at least one year on the date of the transaction concerned , or
- d. a legal person, trust or partnership whose management responsibilities are discharged by a person discharging managerial responsibilities or by a person under points (a), (b) or (c), which is or controlled directly or indirectly by such a person, established for the benefit of such a person, or whose economic interests are materially identical to the financial interests of such a person.

“Conflict of interest” is defined as:

The situation that could arise in any area of activity of the Company within the context of its operations when the personal interest of a member of Staff or relevant person competes with the interests of the Company and/or Group Company and/or at the same time proves to be harmful to the interests of a Client and/or Debtor and/or supplier (of the Company or Group Company).

“Market manipulation” shall comprise the following activities:

- A.** entering into a transaction, placing an order to enter an order to trade or any other conduct that:
 - I. gives, or is likely to give, false or misleading indications as to the supply, demand or price of a financial instrument; or
 - II. it secures, or is likely to secure, the price of one or more financial instruments at an abnormal or artificial level, unless the person in such situation demonstrates that they have entered into such transactions or have given the orders to trade or acted on legitimate grounds and that they have followed accepted market practices;
- B.** entering into a transaction, placing an order to trade or any other activity or conduct that affects, or is likely to affect, the price of one or several financial instruments and which employs a fictitious device or any other form of deception or contrivance;
- C.** disseminating information which gives, or is likely to give, false or misleading indications as to the supply, demand or price of a financial instrument, or secure, or is likely to secure, the price of one or more financial instruments at an abnormal or artificial level, including the dissemination of rumours, where the person who disseminated knew, or ought to have known, that the information was false or misleading;
- D.** transmitting false or misleading information, or providing false or misleading data in relation to a benchmark, where the person who made the transmission or provided the input knew or ought to have known that it was false or misleading, or any other conduct which manipulates the calculation of a benchmark.

“Financial instruments”:

According to the description provided under Annex I, Section C of Law 4514/2018 and in the Directive 2014/65/EU of the European Parliament and of the Council on markets in financial instruments.

“Company”: doValue Greece Loans and Credits Claim Management Société Anonyme (AEDADP)

“Group” or “Parent company”: doValue SpA

“Code”: The Company’s Code of Conduct and Ethics

“Stakeholders”: All persons who directly or indirectly met the Company, such as shareholders, employees, associates, customers, suppliers, as well as Authorities to which the Company reports.

“Competent bodies for the Code of Conduct and Ethics”:

- ✓ Ethics Committee
- ✓ Business and Regulatory Compliance, AML/CFT Unit
- ✓ BoD

“Family” or “Family members” means:

- a. the spouse of a staff member or a person with which a staff member has entered a cohabitation agreement out of marriage or a person with whom a staff member simply cohabitates out of marriage,
- b. the staff member’s dependent children and dependent stepchildren,
- c. all other relatives of the staff member who live together with the staff member under the same roof .

“Client” or “Customer” means:

Credit or financial institutions or loan and credit claim management companies under Law 4354/2015 or special purpose vehicles under Law 3156/2003 which assign to the Company the task of managing their claims from loans or credit facilities which will be or have been granted.

“Debtor” means:

Debtors from loans and credit facilities already granted or to be granted by credit or financial institutions, management of which has been assigned to the Company. They include:

- a. Natural persons,
- b. Legal persons (e.g. credit institutions or other financial organisations or brokers, mutual fund management companies, investment firms, portfolio investment firms, insurance companies, etc.), or
- c. groupings of associated natural or legal persons (Trusts, Funds, Joint Ventures, etc.).