

Missirian – Business Code of Conduct and Ethics

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1. CEO Introduction

Dear Colleagues and Associates,

MISSIRIAN SA demonstrates its commitment to the development and diffusion of its corporate culture by applying applicable law and establishing corporate values, principles, and rules of business-related conduct, that distinguish it for almost two centuries in the international tobacco market.

Purpose of this Code is the efficient response of our company to its strategic business objectives and to the changes and challenges of our era with Business Code of Conduct & Ethics in all its policies, actions, functions, and transactions.

With right governance and exemplary leadership, we will continue to contribute to the progression of corporate social responsibility centered around human, society and the environment.

We respectfully invite all of you to accept the adoption and adherence to this Code of Business Conduct & Ethics.

Sincerely,

Nikolaos Tzoumas,

CEO

2. Scope

2.1. **MISSIRIAN SA** acknowledges that its long-term development and safeguarding of its interests depends largely on entrepreneurial excellence with respect towards human, society, and the environment.

2.2. **Missirian Code of Business Conduct & Ethics** constitutes the declaration of corporate values and principles of labor conduct, in accordance with the applicable legal framework and corporate culture and suggests that the way in which business results are achieved are as important as their achievement.

2.3. Code applies to the entirety its human resources, i.e. members of the Board of Directors, Directors, Supervisors, Advisors and employees at its headquarters, its branches, existing or established, in Greece and abroad.

2.4. Suppliers and partners are also subject to these requirements, as compliance with the Code is a prerequisite for the commencement and continuation of their cooperation with the Company.

2.5. Code complements current legislation, corporate policies, procedures, directives, regulations, and operational collective agreements of the Company.

3. Company values

3.1. The following are defined as Corporate Values:

Transparency regarding all business transactions, financial, commercial, or otherwise.

Respect towards all stakeholders - customers, suppliers, employees, partners, society during the implementation and development of business activities.

Trust between trading parties in all business processes.

Justice concerning the evaluation and achievement of administrative decisions and to all parties involved.

3.2. Missirian SA designates every Director, Supervisor and Employee responsible for the protection of the corporate values and principles, in order to ensure its business activities, based on ethical standards that the company requires from third parties and in return third parties have the right to demand from the company.

3.3. The Company accepts the values and principles of other cultures incorporated into its business activity, but its collective actions must be governed by the core values and principles enshrined in the Code of Business Conduct and Ethics.

4. Code of Conduct Operation Principles

4.1. Company Organizational Behavior Principles

4.1.1. Company is committed to the Protection of Human Rights, as defined in the UN Declaration of Human Rights (UNDHR)* and the International Labor Organization (ILO) Conventions on Labor**.

4.1.2. Company conforms to the Principle of Equal Treatment in Labor Relations, enabling the recruitment, employment, training, and professional development depending on the performance, manpower skills and its operational needs.

4.1.3. Company respects Diversity of people due to racial or ethnic origin, religious or other beliefs, disability, age, and gender orientation in terms of employment, education, and professional development.

4.1.4. Company conforms to the European Regulations and National Laws concerning Personal Data Protection, on the one hand respecting private privacy and on the other hand ensuring that the collection, processing, use and observance of personal information is implemented only to the necessary extent and in accordance with applicable law.

4.1.5. Company contributes to the formulation of clear and specific policies, procedures, systems, and operational methods focused on ensuring internal organization, order, proper operation, improved productivity, and compliance with its legal obligations.

4.1.6. Company ensures the provision of a healthy and safe work environment by defining, adopting, and adhering to rules and measures of health, hygiene, safety, and environmental protection, in accordance with current legislation and relevant standards.

* 1948 UN DECLARATION FOR HUMAN RIGHTS

** 1999 Convention no. 182 of the ILO on the Abolition of Occupied Forms of Child Labor, Convention no. 138 of the ILO on the minimum age of access to employment, the 1948 Convention on the Freedom of Assembly and the Protection of the Right to Cooperation

4.1.7. Company promotes and encourages open, transparent and timely communication with shareholders, employees and other stakeholders, in order to build long-term relationships of trust.

4.1.8. Company conforms to Directive 2019/1158 amending Directive 2002/73 / EC, which prohibits any harassment or other offensive activity which is manifested in undesirable behavior and has the purpose or effect of infringing on the dignity of the person and creating intimidation, hostile, demeaning, humiliating or aggressive environment. When defining the concept of harassment, good transactional manners are also considered.

4.2. Employee Organizational Behavior Principles

4.2.1. Everyone in the Company is obliged to respect and comply with the laws and the current regulatory framework, in all countries of its operation.

4.2.2. Employees must perform their work in accordance with the terms of their Individual Contract, terms of the Work Regulation, present Code, as well as the instructions of their supervisors, in a spirit of close and sincere professional cooperation and mutual trust, developing the relevant initiative, corresponding to the nature of their duties.

4.2.3. Employees must behave in a manner that respects the appreciation and trust of Management and its immediate and indirect Supervisors, accept the work assigned to them and perform the work assigned to them diligently.

4.2.4. Employees must demonstrate loyalty to the Company in all their actions and act in the best interests of the company both in the performance of their duties and in their social behavior in general.

4.2.5. With their work, their behavior, and their general activities within or outside of the work environment, employees must not discredit or violate prestige, undermine and oppose the interests of the Company.

4.2.6. Employees must ensure the safety and confidentiality of information about the Company's business activities and comply with the Confidentiality and Privacy Policy, which is an integral part of their Individual Contract and:

In case of employment termination, employees are obliged to protect Company's commercial secrets and other proprietary information, until the information becomes publicly available or until the Company no longer considers such information to be trade secrets or proprietary.

Supervisors should be careful so that data not concerning the employees who are responsible for the specific field of activity befall to their knowledge.

4.2.7. Employees are required to take necessary safety measures and wear personal protective equipment to avoid impairment of their health, the health of other employees, or third parties.

4.2.8. Employees are required to respect Company's assets and to use and manage wisely the resources available to them for the purposes of their work. Assets include both tangible and intangible, as well as third party assets. Particular attention should be paid to avoiding losses, damages, unnecessary expenses, or abuses of the Company's assets.

4.2.9. Employees must refrain from pursuing direct or indirect personal or family interests that run counter to the Company's interests.

4.2.10. Employees must adhere to a proper professional dress code.

4.3. Employees union interactions

4.3.1. Company and the Employees' Union make every effort to maintain a climate of mutual trust and constructive approach of labor issues.

4.3.2. Company facilitates the Employees union in accomplishing its trade union duties in accordance with the provisions of the current legislation.

4.3.3. To ensure good and effective communication, regular periodic meetings are held between representatives of the Company and the Employees' Union, as well as unscheduled meetings whenever the need arises.

4.4. Transactions with customers, suppliers, collaborators, competitors

4.4.1. It is a primary value for the Company to continuously strive to satisfy its customers by providing high level of services and products, adhering to all quality standards, using all means of technology, agronomic protocol and updated operating methods, and in full compliance with current legislation on health, hygiene, safety, and environmental protection.

4.4.2. Company provides all its prospective suppliers with impartial and equal opportunities. Decisions are based on objective criteria to ensure the interests and meet the requirements of the requested products and services and the provisions of relevant legislation, so that:

- total cost of ownership of any material or service be minimized
- the competitive position of the company is strengthened
- corporate image of the company as reliable member of the business community is promoted

4.4.3. It is the Company's policy not to co-operate with any supplier or partner who is known to engage in practices of child labor, child exploitation and any other form of illicit treatment. Any violation of labor law is not acceptable to the Company and if recorded will be a reason for the immediate termination of the business relationship.

4.4.4. Business transactions are made on fair and reasonable terms, fulfilling the contractual obligations of both members. Long-term agreements are compatible with the principles of free competition, governed by the mutual obligations and rights of the two Contracting Parties, and are periodically monitored for whether they remain competitive.

4.4.5. The Company expects its partners to apply best practices of business ethics and to comply not only with laws and internationally established commercial rules, but also with their own social and environmental sensitivity.

4.4.6. Employees involved in the submission of proposals, in the preparation of tenders or in the negotiation of contracts and commercial agreements, must ensure that all statements, communications and representations to customers, suppliers and partners are accurate and true. After the award, all contracts must be in accordance with the specifications, requirements, and provisions.

4.4.7. It is the Company's policy not to knowingly infringe intellectual property rights of others and to respect the trade secrets or other proprietary information of third parties.

4.4.8. The Company respects its competitors and adopts principles and practices of healthy, fair, and legitimate competition, primarily for the benefit of the customer.

4.4.9. The Company strictly adheres to national and international legal requirements regarding trademarks and unfair competition.

4.5 Public sector and Legislation interactions

4.5.1. Company complies with all laws governing its business activities.

4.5.2. Company facilitates the work of the competent state authorities and bodies during their audit.

4.5.3. Company develops cooperation with municipal authorities and communities to improve educational, cultural, economic, and social well-being in these communities.

4.6. Media interactions

4.6.1. Company encourages continuous, honest, and open dialogue with all media and provides equal, responsible, and transparent information, aiming at timely and reliable information about its activities.

4.6.2. Any action of promotion by the Company regarding its products and services will contain accurate data, will follow applicable law and no information necessary for the shaping of a fair judgment by the public will be concealed.

4.7. Sponsorships

4.7.1. The Company may offer or accept professional sponsorships, in accordance with current legislation, usual market practices, budget and related policies.

4.7.2. The Company does not make contributions to political parties, committees, or political personality, to avoid promoting political interests.

4.7.3. Employees need to be aware that their possible involvement or participation in any political activity should be on a personal basis, at their own time, at their own expense and in accordance with applicable law. Company's financial or other resources cannot be used for political activities.

4.7.4. Bribery, corruption, and unfair practices to influence any business decision are prohibited.

4.8. Corporate social responsibility

4.8.1. The Company operates in a way that ensures the alignment of its objectives and strategy with the fulfillment of the interests of its shareholders and customers, while considering the interests of its human resources, partners, society, and the need to protect the environment.

4.8.2. Designated personnel that perform administrative and managerial duties or carries out relevant administrative or managerial decisions must always consider serving the purposes of corporate social responsibility while doing so.

Indicative examples:

Contribution of know-how, experience, agronomic support, and guidance towards the tobacco growers

Use of natural resources sustainably to the environment. Ensuring that any environmental impacts from operational activity are identified, checked, measured and monitored. Emphasis is placed on informing and raising awareness of all stakeholders.

Local and cultural development

Active participation in tackling social issues, by serving socially important or charitable purposes and supporting socially disadvantaged groups

4.8.3. Charitable contributions must be made in accordance with a specially approved budget.

4.8.4. By advocating and aiming for a sustainable development, the Company is committed to participation, cooperation, and good relations with local communities in all areas where it operates and cooperates with all stakeholders.

4.9. Business archives

4.9.1. All financial transactions of the Company are recorded in its accounting statements. Data are kept accurate, provide the necessary information and are in accordance with current national and international accounting standards and principles.

4.9.2. No payment by the Company will be approved or made with the intention that any part of that payment be used for any purpose other than the one described by the documents supporting the payment.

4.9.3. All those involved in the creation, processing and recording of business information are considered responsible for their integrity. Any business, accounting or financial entries should accurately reflect the information described in the supporting information.

4.9.4. Any concealment of information by Management, or by the Company's independent Auditors, is prohibited.

4.9.5. Any correspondence, printed materials, electronic information, documents, or publications of any kind are property of the Company and must be kept in MISSIRIAN SA.

5. Code compliance and conformity

5.1. By accepting employment to MISSIRIAN SA, each employee becomes responsible for compliance and conformity with this Code, the respective decisions, policies, procedures, and instructions of the competent bodies of the Company.

5.2. Compliance with this Code is everyone's responsibility, and no one can justify any unethical action, on the grounds of carrying out the instructions of his Supervisor.

5.3. The staff must inform their immediate or indirect supervisors and the Human Resources & Quality Management Directorate if they come to terms with events or behaviors that are contrary to the Code and could harm the Company, so that the issue can be settled through internal business procedures.

5.4. The Directorate of Human Resources & Quality Management is responsible for promoting a positive and ethical work environment. It is responsible:

- For the development and maintenance of the Code
- To submit, gather, and examine proposals concerning improvements and precautionary measures
- For the awareness and guidance of all staff (newly recruited and existing) on the Code and its revised forms
- To supervise the compliance of the Code to the staff and its correct application

5.5. Violations of these provisions can have a serious negative effect on the image and results of the Company. Depending on the circumstances, the Company has the right to prosecute disciplinary proceedings or even the legal pursuit of civil damages and the criminal prosecution of the employee who interfered with the provisions.

5.6. Full compliance with the Code of Conduct & Ethics demonstrates the Company's commitment to a business culture that promotes the highest possible standards of ethics, morality and prosperity for the company and its employees.

NOTE

Present document is in effect, revised and distributed in accordance with the applicable relevant procedures for all audited documents of MISSIRIAN SA. Unauthorized sharing, replication and use partly or otherwise is not allowed, as well as its use in terms that do not concern the specific procedures.

6. Declaration of code acceptance

I confirm the receipt and compliance of Missirian Business Code of Conduct and Ethics

Name:

Signature:

Date: