



VIPA GROUP
VOL.02

VIPA'S
CODE OF BUSINESS
CONDUCT & ETHICS

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INTRODUCTION

This document describes the core principles or standards that guide the work of VIPA Group. It provides a framework for our people and partners' conduct and sets the company's expectations for all VIPA's business relationships. All partners should comply with the present code while the violation of the guide will result in applying disciplinary actions.

Our workplace is founded on mutual respect, and we will not allow anyone to compromise this foundation.



01 — Our Values

We are a **family business** to the core. Our proactive and **agile** teams are handling our business partners with **care** and attention. We encourage **innovation** by supporting open dialogues and the freedom of expression. We strive to become better in multiple aspects, day-by-day, so we promote **sustainable development**, while our **partnerships** are based on **respect** and mutual understanding



02 — Our Mission

Our mission is to turn the tide in the fight to **preserve** the environment, by enhancing the **recycling process** through **the circulation of materials**, and by increasing **product and procedural quality** through the adoption of relevant **laws** and **standards**



03 — Our Vision

Our vision is to embrace **innovative thinking** by constantly assessing our business environment for new opportunities. With our **champions' state** of mind, we strive to pursue a **circular economy**, while we both **engage** with and **benefit** our customers, suppliers, and stakeholders

RESPECT IN GOVERNMENT & LAWS

Compliance with the laws

VIPA Group complies with all international and national laws, in all its offices and facilities worldwide, and expects all its employees and business partners to behave accordingly.

All the employees are also expected to understand and respect legal and policy requirements as they proceed to a business partnership with the Group.

In cases of potential internal or external violations, please fill in the Open Communication Form. The Group will then proceed to a detailed investigation of the matter.

Accuracy of Company Records

VIPA Group develops and maintains reliable and accurate business records and reports to inform its network and relevant partners.

On that note, all records must be accurate, honest, and complete. All VIPA's operations must comply with national and international laws regarding the accuracy and maintenance of the Group's financial books and records.



RESPECT IN THE MARKETPLACE

Commercial Bribery

We believe in good governance and fair implementation of the laws. Therefore, we understand that in many cultures gift exchange is part of robust business relationships. However, we strongly believe that such actions should never intend to influence the decision-making of any party, no matter what. On that note, seasonal gifts that portray goodwill are permitted. Cash as a gift is prohibited.

Conflict of Interest

A conflict of interest occurs when a business partner's interest interferes with VIPA's interests. Employees must never take advantage of their job position or attempt to take personal benefits for themselves or their families.

In other words, a conflict of interest may arise when a situation offers benefits to a party and affects the company for which she/he is working. Members of the staff that are aware of a conflict of interest (or the possibility of it) must report it to their manager or People Operations department to be the subject of investigation or prevention.



Corporate Gifts

In VIPA Group, we do exchange corporate gifts both internally and externally. Our corporate gifts intend to cultivate a more circular culture and demonstrate our appreciation to our employees and business partners.

Confidentiality

In VIPA Group, we take confidentiality seriously. Employees are obligated not to disclose any confidential or private information identifying or relating to the company to anyone outside of VIPA during their employment or afterward.

Confidential information is considered to be any internal data and it is your responsibility to protect them. Examples of confidential information are below (but not limited to them):

- Employees' salaries, records, contracts, personal data
- Unpublished financial information and prospects, agreements, investments
- Data of customers, partners, vendor, suppliers
- Customer lists (existing and prospective)
- Unpublished goals, forecasts, and initiatives marked as confidential

Divulging of confidential information of our business will result in disciplinary action, even in termination of employment.



As of confidentiality, you should:

- Lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Make sure you view confidential information on secure devices only
- Only disclose information to other employees when it's necessary and authorized
- Keep confidential documents inside the company's premises unless it's necessary to move them



Child & Forced Labor

VIPA Group is committed to the United Nations Universal Declaration of Human Rights. VIPA complies with human rights and convicts all forms of forced and/or child labor in its facilities and operations, following all the national and international regulations on minimum wages, overtime, and maximum hours. We strive to ensure the visibility of our supply chain as well. On that note, we assess our partners against their compliance with ILO 132- Minimum Age Convention, and ILO 182- Worst Forms of Child Labor.



Corporate Social Responsibility

At VIPA Group, we believe in Corporate Social Responsibility in all our operations. All our activities are aligned with VIPA's Sustainability & CSR Policy. We are proud of our partnerships with NGOs, and the support we provide to the local community. We keep on engaging with our stakeholders to find innovative ways to contribute to Circular Economy and create more positive externalities for us, our network, and the communities we do business with via our Materiality Survey.



Environmental Protection

We comply with the environmental regulations in the jurisdictions in which we operate. All of our materials are aligned with the EU's Waste Catalogue, while our final paper products are certified as conforming to the requirements of the Forest Stewardship Council® (FSC®) and the Program for the Endorsement of Forest Certification (PEFC).

RESPECT IN THE WORKPLACE

Equal Opportunities

VIPA is an equal opportunity employer. We don't tolerate discrimination against protected characteristics (gender, age, sexual orientation, race, nationality, ethnicity, religion, disability) or any other personal status. All employment practices, including but not limited to recruitment, assessment, promotion, are based solely on merit, qualifications, and business needs at the time.

If you experience conflict with a colleague, ask your manager or People Operations for advice before tensions escalate, while for external partners, fill out the Open Communication Form.

Employees Relationships

We expect a harmonic collaboration between all employees of VIPA. You are expected to show professionalism and keep appropriate relationships with your colleagues. Our company complies with all measures and obligations relating to the ILO Convention 190- Violence and Harassment (International Labor Organization).



Harassment

Any form of discriminative, offensive, and unwelcome behavior that occurs. It may have verbal/written forms, such as offensive jokes/ comments or even visual forms, like stalking, staring, whistling, gestures. Physical harassment can include (sexual) assault or unwanted physical contact.



Bullying

Any continuous or repeated action that causes either physical or emotional harm. It can include such tactics as verbal, non-verbal, psychological, or even physical abuse such as humiliation, gossip, spreading rumors, talking behind someone's back, intimidating, be offensive.

Workplace Safety & Health

One of VIPA's corporate value is to be considered a family business. Hence, it treats its employees in the same manner. Our company is committed to creating a hazard-free workplace. To this end, we ensure workplace safety through preventative action and emergency management.

The Group complies with all health & safety regulations in all its offices globally. VIPA Group also complies with ISO 9001:2015-Quality Management System.

Employees Privacy

VIPA Group respects employees' privacy. We only gather personal information in cases when it is essential for the company's operations efficiency. Such information is kept confidential and it is always handled by the relevant department that requested it in the first place. If you want to find more on our GDPR policy, please click [here](#).

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Questions & Reporting Violations

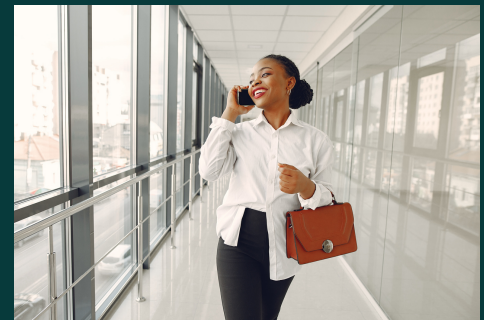
Employees should feel free to speak with anyone in their management chain when they have a question about the application of the Code of Conduct or when in doubt about how to properly act in a particular situation. Employees can always contact the Human Resources department for any concerns arising. VIPA Group does not allow retaliation against an employee for reporting misconduct by others in good faith. Employees must cooperate in internal investigations of potential or alleged misconduct. Employees who violate the Code of Conduct will be subject to disciplinary action up to and including discharge.

HOW WE REACT

Any violation of VIPA's Code of Conduct or any other policy is a serious matter for us. It is our employees' obligation to bring any suspected violation to the attention of the upper Management. Below, we list some of the methods of notifying the Management, including options that preserve anonymity:



**APPROACH PEOPLE
OPERATIONS
DEPARTMENT**



**CONTACT
YOUR DIRECT
MANAGER**



**FILL IN THE ANONYMOUS
OPEN COMMUNICATION
FORM**



**VIPA GROUP
VOL.2**

CODE OF CONDUCT

For more information please visit us at:

vipagroup.com
viparecycling.gr