



Code of Conduct

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TABLE OF CONTENTS

PREFACE	2
WHO MUST FOLLOW THIS CODE?	2
A. INTEGRITY & ETHICS.....	2
B. EMPLOYMENT	6
C. REPORTS, QUESTIONS & CONCERNS.....	7
ABBREVIATIONS – DEFINITIONS	8

The mission of Q-PLAN INTERNATIONAL is to serve as a vigorous cell of society.

PREFACE

It is our strong belief that under any circumstances, we should behave in a professional and ethical way. We are aware that each one of us is unique (we do not believe in separating people in “groups” of any kind) and thus may adopt different cultural and behavioural norms, but as a company, we need to have a common understanding of the basic aspects of behaving “professionally and ethically”.

This Code of Conduct (“Code”) is not exhaustive (and could not be), but sets out rules, guidelines, and examples of our expected behaviour.

WHO MUST FOLLOW THIS CODE?

All staff (including shareholders, employees, people working under direct contracts) and vendors (i.e., freelancers and subcontractors) are expected to study and follow the Code.

Our Company provides services to many different types of organisations, deals with many different stakeholders, and works with many people, all of which should be treated properly and need to be able to rely on us to behave with a high level of professionalism and integrity.

A. INTEGRITY & ETHICS

A1. Basic Principles of Corporate Integrity & Ethics

Honesty & transparency

We aspire to build strong, long-lasting relationships of trust, both with our staff members as well as with all external parties with which we do (or potentially will do) business. Towards this direction, honesty and transparency are core values of our Company and they are embedded in our everyday practices – of course respecting limitations related to privacy and confidentiality. We do not under any circumstances pretend to be something that we are not, nor act in bad faith. We are clear about who we are, what we do, why we do it and for whom we are doing it.

Free Competition

We fully respect competition law and neither practice, nor condone distortion of competition in any way. We are in no way in a monopoly situation, nor in an oligopoly situation, nor do we have any influence over the market or market pricing in any way. We do not enter into any form of agreement or understanding with competitors to fix prices or otherwise restrict free competition.

Insider trading

Insider trading of any kind is not accepted. If in any case we are subject to information that could in any way be used for insider trading, this information is treated with the same full confidentiality with which all information of our clients and partners is treated and all staff members are aware that they cannot take any action on any such information.

Equal opportunity

We are an equal opportunity company and business partner. We do not discriminate people based on any kind of “grouping” criteria (e.g., race, age, gender, (dis)ability, sexual preference). All staff-related decisions are made based on a meritocratic approach.

Privacy

We respect the privacy of all stakeholders and (of course) our staff. We collect, process and store only data that are necessary in order for us to fulfil our contractual and legal obligations. We comply with the General Data Protection Regulation (GDPR) regarding personal data processing.

Quality

We have considered quality to be of paramount importance in every aspect of our operation since our establishment.

Our quality approach starts from our hiring stages where we screen as many candidates as possible and carry out extensive interviews and tests. Our staff is constantly trained and coached to continue developing their skills and competences with a view to improving our company as a whole and thus, the work we deliver.

We seek constructive feedback and we encourage our partners/ clients/ colleagues to provide us with feedback on our work. We regularly assess our work and use respective feedback in order to identify better practices and learn lessons that can drive our continuous improvement.

Employment / Labour law

We comply with the employment and labour laws and regulations. We always strive to improve the working conditions for our staff, beyond our legal obligations.

Tax Law

We comply with all the applicable tax legislation. We keep accurate books and records to honestly describe our finances. Our annual financial statements are publicly available via our website, as well as via the website of the GENERAL COMMERCIAL REGISTRY. We cooperate with the tax authorities, provide all data that may be requested and in general facilitate any type of audit.

Moreover, for every research and innovation project we participate, we implement external audit procedures, even when this is not a contractual obligation.

GDPR

We comply with the GDPR. We have developed respective documentation as well as other appropriate technical and organisational measures as part of our management system (policies, procedures) for dealing with any personal data that we may process in an appropriate manner. Furthermore, we continue to monitor developments on best practices and adapt our policies and processes accordingly.

A2. Company Assets

Confidentiality

As a part of our business, we are sometimes privy to confidential information from our business partners. We view the trust that our business partners place in us by sharing confidential information as a sign of recognising our reliability and trustworthiness and we consider this fact a profoundly serious responsibility.

Our staff is trained on issues pertaining to confidentiality and take the NDAs they sign very seriously. Furthermore, all contractors that may in any way deal with such information are also obliged to sign an NDA. Beyond the legal implications of the NDA, we stress to all contractors, the importance of respecting the confidentiality of any information that we share with them. Finally, we also ensure the security of the confidential information through the application of specific policies and procedures in the frame of our management system.

Intellectual property

In the course of our work, we may obtain and use intellectual property of others. If such property is used, then the respective terms of use (e.g. compensation) should be agreed with the rights-holder in advance. Furthermore, we may temporarily or permanently be in possession of intellectual property of our clients, which we fully respect and use following the guidelines and rules set out by the client and the respective contract.

Finally, we generate new intellectual property as a part of our work, including both internal work as well as client/ collaborative work. For this kind of intellectual property, the relevant clauses on intellectual property in our contracts or case-specific agreements are followed.

When intellectual property is not generated in the frame of a specific project, it is retained within our Company and not used for personal or external purposes. In the cases where material is of a general nature (e.g., templates and general presentations) and these are shared with clients or third parties, intellectual property is either retained by our Company or shared with those parties.

Our staff is always vigilant when it comes to intellectual property rights and is very careful not to violate such rights of others. When there is a doubt about the existence and ownership of such rights, the Director or the respective Head of department is notified to set the proper course of action.

Use of Resources

We use resources of our Company/ partners/ clients (materials, equipment, premises, money etc.) with respect and care. When spending money that belongs to our Company/ partners/ clients, we are diligent in ensuring that the expenditure is appropriate and justified. In general, we try to avoid using or in any way deciding about the use of partner/ client resources (especially money), to avoid misunderstandings.

A3. Basic Principles of Personal Integrity & Ethics

Conflict of Interest

As a rule, we act in the best interest of our Company and of our clients. We consider it a conflict of interest when personal or professional activities or relationships interfere with our ability to serve our Company's and our business partners' best interests. This includes active investments in competitors or other organisations the interests of which may conflict with our own interests and those of our clients. It also relates to outside employment, speeches, presentations, and similar activities – such activities are permitted only as long as our management is informed and has approved when and in what context they happen and provided that they do not conflict with the interests of our Company and of our clients.

It is absolutely normal that our staff members have relatives or friends that invest in or work for (potential or actual) competitors of our Company and our clients. This is not an issue unless these staff members are in a position to make or significantly influence decisions that relate to our business or our work for our clients – such relationships should be reported to our management in order to assess them and take action if needed.

Anti-bribery & corruption

We do not support nor condone bribery or corruption in any way. Under no circumstances do we accept or commit any kind of improper payments. Any such behaviour is illegal, unfair, is not tolerated and is reported immediately.

We may offer or accept gifts and hospitality (e.g., meals, entertainment, accommodation) only if it is legal, modest, reasonable, and appropriate and up to a value of 100 euro/person to/ from clients, competitors, or others. Should anyone make us offers that exceed this limit, we either kindly decline them or seek approval from the Director. The Director is responsible for approving such offers from our side to any

external stakeholders. Of course, the above do not apply if accommodation/ travel costs are to be paid by a party under respective contractual provisions.

We never offer or accept any gifts, favours or alike for which there is any expectation of quid-pro-quo.

Digital ethics

Our staff is expected to act in a fully ethical way when interacting in person as well as digitally – actually, for us there is not much of a difference (bad behaviour remains such regardless of how it is expressed). We respect others, along with their opinions, views and rights. In general, we avoid communicating in our individual capacity with external parties in the frame of business occasions (e.g., meetings, project events, teleconferences). In any case, when we communicate, we clarify what is in our professional capacity and what is in our individual capacity.

While using the social media, we safeguard the company's reputation and image as well as its projects and services.

In any case, we must not reveal any confidential information about the company and its employees.

B. EMPLOYMENT

Harassment, Discrimination & Bullying

Harassment, discrimination and bullying are not tolerated in our company. Any kind of harassment, discrimination or bullying is cause for dismissal. All team members are expected to report any incidents of harassment, discrimination or bullying to the Head of their department or the Human Resources Manager, or the Director, without any risk of reprisal and with the assurance that action will be taken to address all issues. Should anyone outside the company ever be harassed, discriminated or bullied by one of our staff members or vendors, we kindly request that they report this to us immediately by contacting tzika@qplan-intl.gr.

Dress code

We do not implement a specific dress code – in general the rule is that we must be dressed accordingly, depending on the occasion.

So, in the office, in general, "Smart Casual" is what we encourage, i.e., comfortable, but presentable clothes.

During formal Client/ Project meetings, "Full Business Attire" is needed, i.e., suit and tie for men and equivalent for women. This style applies to any kind of business/ project meetings with EU Officers.

Being properly dressed is one way of demonstrating our respect not only to the people we meet, but also to the activity that takes place.

Drugs & Alcohol

Consuming drugs or being under the influence of drugs while being in the office, with clients or acting on behalf of our Company in any way is not tolerated and is cause for dismissal.

Moderate consumption of alcohol, for example at a business lunch, is a cultural norm in some countries and given that we work in a multi-cultural environment, alcohol consumption in small quantities is accepted for situations like business lunches, partner and client events, etc. However, our policy is to consume alcohol with moderation and under no circumstances consume quantities that would impede our abilities to stay professional.

Good Colleagues & Ambassadors

We believe in being good colleagues and good ambassadors of our Company.

We know that we all belong to the same team and the results achieved will affect us all, so we do our best to help each other.

We act in a polite and courteous manner and help others in our offices or the premises of our clients/partners. For example, we all hold the door for the delivery persons, we all answer the phones in a courteous manner (since there is no receptionist or secretary), we offer to get coffee for our colleagues and their guests when there are meetings, etc.

C. REPORTS, QUESTIONS & CONCERNS

Although the Code provides guidelines and sets out a spirit, there may be questions or concerns about it. “Sweeping issues under the carpet” is not our practice. Anyone is free to raise concerns in good faith, is encouraged to assist in any investigations and discussions and above all, is expected to report any kind of behaviour that they may think is unprofessional or unethical. In any case the Human Resources Manager must be notified for any deviation from the Code, to address the issue.

- **If you are a staff member or vendor:** Refer to the Head of your department, the Human Resources Manager or Director.
- **If you are someone outside the Company:** Contact us by email at tzika@qplan-intl.gr.

Anonymous reports can be sent via post at Q-PLAN INTERNATIONAL PC, 11 El. Venizelou str., PC 55133, Thessaloniki, Greece, marked CONFIDENTIAL, attention of Human Resources Manager or Director.

ABBREVIATIONS – DEFINITIONS

NDA Non-Disclosure Agreement

GDPR General Data Protection Regulation

Harassment Illegal behaviour towards a person that causes mental or emotional suffering, which includes repeated unwanted contacts without a reasonable purpose, insults, threats, touching, or offensive language.

Discrimination Treating a person or particular group of people differently, especially in a worse way from the way in which you treat other people, because of their skin colour, sex, sexuality, etc.

Bullying The behaviour of a person who hurts or frightens someone smaller or less powerful, often forcing that person to do something they do not want to do.

Note: For the terms “Harassment”, “Discrimination” and “Bullying”, the definitions of Cambridge Dictionary apply, <https://dictionary.cambridge.org/>