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## *Message from the Managing Director*

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Dear colleagues,

Unilog is a leading Logistics Company in the healthcare industry. It is distinguished by both the quality of its services and its customer-centric approach. We are convinced that the prosperity and growth of a business relies heavily on the trust that inspires the customers, shareholders and suppliers. The relationship of trust and co-operation should exist primarily between the Company and its staff, as well as staff members among themselves.

It is therefore necessary in order for this belief to exist and be maintained, to set a series of rules that will be followed and respected at all levels. The purpose of this code is through precise rules to help business people determine how they will act in real-life situations inside and outside of the business. Undoubtedly, a code can not predict everything and that's why common sense must be applied on a number of occasions, which is the responsibility of each one of us individually. For this reason, we adjust our code of conduct whenever it is necessary.

Our goal is to look forward and through the creation of added value to shape a better future for us and our partners. Our ethical commitment to our partners and our business integrity are the pillars of our business policy and are reflected in our code of conduct. All Unilog employees have to respect and comply with the rules of the code in their transactions with colleagues, customers, suppliers or investors.

This code is the framework of our cooperation. I am absolutely sure that you will ensure the compliance with it and transmit the Corporate Ethics on which our Company's operation is based, having managed to gain the trust of its partners over the years.

Yours Sincerely

*S. Linardakis*

*General Manager*



## I. What is good ethics?

**Unilog** is negotiating with a variety of people and organizations that are our partners. Our image as a Company depends on how employees behave in the business world. There is no substitute for personal integrity and healthy judgment. When you face a difficult situation, consider these questions:

- Is my action or my decision legitimate?
- Is it in line with our values and our policies?
- Is it right and free of personal conflicts of interest?
- Can my action or my decision resist to public criticism? How would this look like in a newspaper?
- Can my action or my decision protect Unilog as a Company with high ethical standards?

If the answer to each question is "yes", the action or the decision based on the following principles of behavior is most likely the right one.

**If you are not sure, ask. And keep asking until you're sure!**

## II. Our Ethical Commitment

### Focusing on Quality

Our commitment to quality is the core of our work. In order to achieve the highest quality standards, we are constantly working to improve our structures and processes for the benefit of our customers. This applies to services, management, and behavior of ours as well.

### Satisfaction of the customer

We give high priority to making our customers successful and satisfied, knowing that customer success guarantees our own success. Our actions are governed by the knowledge of the universal and local requirements of customers and the market. We include and prioritize customer focus in all our processes, projects and agreements.

We know that we will be measured depending our moral, social and environmental performance, as well as the quality of our services.

That is why we strive for best practice in all these areas to ensure our customers' confidence.

### Laws and Ethical Standards

Guided by our Corporate Values, we strive for the continued development of our business, founded on the three pillars: our financial performance, our environmental management and social responsibility. We respect the different interests of our clients, our employees and our partners with integrity, fairness and honesty. We strive for excellence in both our business performance and our moral behavior.

Unilog acts on the basis of the principles of the United Nations and International Law. We respect Human Rights within our sphere of influence, we carry out our work so that our company becomes an employer of choice. We respect the principles of the International Labor Organization (1998) "Declaration on Principles and Rights at Work" in accordance with national law and practice.



### **Transparency**

We commit ourselves to transparency in our dealings with stakeholders. Transparency and honesty are the guiding principles in all communication activities internally and externally. The public will have access to information about our Company that is required or recommended by internationally recognized corporate governance standards.

### **Accounting Standards and Reporting Standards**

Unilog relies on the authenticity and accuracy of the information recorded in each accounting record for correct decision making. It is of the utmost importance that files relating to security and personnel as well as accounting and financial data are protected. All business transactions must be recorded accurately in our accounts in accordance with the specified procedures and accounting standards. The accounting records reflect and describe the nature of the underlying transactions.

### **Money laundering**

Unilog strictly complies with laws and regulations designed to combat revenue from illegal activities. This includes laws and regulations that require reference to currency transactions.

## **III. Our Standards of Working Together**

### **Individual Responsibility and Participation**

The skills and commitment of our people is our greatest advantage. We expect our employees to conduct their business in a business way and accept their individual responsibility. We strive to involve our colleagues in projects and decision-making in order to achieve our common goals with credibility and commitment.

### **Mutual respect and transparency**

All relations between directors and employees at all levels should be governed by mutual respect, transparency, honesty and spirit of trust and co-operation.

We give and seek feedback and are actively and openly communicating with each other. We are committed to a fair and open debate and we seek different opinions. We urge our colleagues to speak at once and express their ideas and concerns.

Team spirit is triggered by the open spirit of cooperation. That is why we support "open door" policy and initiatives to share and exchange knowledge.

### **Diversity and discrimination**

We see employee diversity as a guiding principle in employment policy. This means that we promote the diversity and heterogeneity of employees in the company in order to achieve the highest possible productivity, creativity and functionality.

Skills, performance and moral code are our only indicators of employee qualifications. We do not categorize or accept discrimination in respect of sex, effort, religion, age, disability, sexual orientation, sexuality, nationality, or other characteristics protected by law.

Every employee is required to contribute to an environment of respect that excludes all kinds of harassment, including intimidation at the workplace, undesirable sexual harassment, undesirable physical contacts, intentions, or a work environment poisoned with harassing jokes, words and inaccurate comments.



## **Health Management**

Our employees deserve to work in a safe and healthy environment. Therefore, we are committed to health and safety regulations in the workplace, expressed in our health and safety policies. We strive to promote the physical and mental health of our employees. Our goals are the low rate of illness as well as the low accident rate. We promote health care as a key component for lasting productivity and quality of our services. We prohibit all kinds of violence and attack at work, including the threat and unwanted behavior.

## **Company Property**

Use of the Company's property, including workforce, equipment, buildings or other assets for personal benefit, is forbidden unless expressly stated by agreement. Every employee has the responsibility to ensure and make proper use of Unilog's property.

Intellectual property is a valuable asset and must be protected by an unauthorized user. This property includes trade secrets, confidential information, copyrights, trademarks, logos as well as customer lists, business opportunities, product specifications, if they belong to affiliated companies with Unilog or its affiliates.

## **Legal procedures**

Employees must avoid actions that might involve or lead to Unilog or its staff being involved in any illegal practice, including the employment of employees or the use of the Company's assets for unlawful profits.

Pending litigation, court procedures and investigations concerning Unilog must be handled quickly and appropriately to protect and defend the Company. Employees threatened by pending lawsuits or other legal procedures or business-related investigations are required to contact Unilog's legal department immediately.

## **Confidential information**

Any person with confidential information is prohibited by law to buy or sell Unilog's stock using this information. Employees are at risk of civil and criminal penalties if they disclose confidential information that one might use at the expense of the Company's property. Trading such information is illegal, whether the employees use them for their own benefit or others use them on their behalf.

## **Social media**

Unilog gives great importance to preserving its image through social networking tools (Facebook, LinkedIn, Twitter, Youtube) and expects responsibility from employees involved in these networks not to damage the fame and reputation of the Company.

# **IV. Our business integrity**

## **Dialogue with business partner**

We are committed to dialogue and partnership with our business partners all over the world. We share principles of moral behavior, social engagement and respect for the environment with our suppliers, subcontractors, and consultants. We communicate our principles to our partners and we urge them to follow our own standards.



### **Conflicts of interest**

We require that the directors, supervisors and employees set high standards of ethics in dealing with conflicts of interest. They should disclose any relationship with persons or companies with whom we have co-operation and can lead to a conflict of interest. Such relationships include a relationship by blood or marriage, partnership, participation or investment in partners.

### **Fair competition**

We are committed to free business and fair competition. The corporate business must be conducted solely on the basis of values and open competition. We work with suppliers, hire employees, or other intermediaries only with fair competition. We are legally required to make business proposals in the interest of the company, regardless of understanding or agreement with a competitor. As a result, the company and its employees will avoid any conflict that violates or appears to violate antitrust laws.

### **Bribery and corruption**

We believe that the excellent quality of our services is the key to our business success. That is why we negotiate with all our customers, suppliers and government agencies in simple ways and in line with international anti-bribery standards as outlined in international and national anti-corruption laws. This includes any transaction that can be perceived as such.

### **Government officials**

Unilog expressly prohibits the realization, promise or authorization of any payment or any provision to a public representative who inappropriately and improperly will be persuaded to undertake any governmental action or decision that will assist the Company in acquiring or retaining a work or acquiring a comparative advantage. Unilog also prohibits the involvement of any other Company or individual in the above activities. Due to the fact that the term "government officials" is so broad, it is likely that Unilog interacts with government officials in the normal course of its operations.

According to Unilog, a "government official" is widely translated and includes: a) any elected or appointed state person; b) any employee or person acting for or by a government official, organization or enterprise performing a government function; political party candidate for public office, officer, employee, or person acting for or on behalf of a political party or candidate for public office; d) an employee or a person acting for or on behalf of a public International Organization. "Government" is intended to include all levels and subdivisions of the state. Moreover doctors working in public hospitals will be considered as "government officials" according to Unilog's policy.

### **Gifts and benefits**

Employees should not seek services, gifts or benefits from customers or suppliers that affect or appear to affect the employee code in the Company's representation. Gifts and entertainment can be exchanged at a level that does not go beyond the usual formal courtesy of the employee in conjunction with ethical practices and applicable law. In case of doubt, employees should consult with the supervisor or with the human resources management.

### **Financial transactions**

Unilog, subcontractors as well as any of its staff or associates acting on behalf of Unilog in connection with customer service may not offer "facilitation payments". "Facilitation payment" is a nominal unofficial payment to a public representative to ensure or accelerate its routine performance, non-distinct public action. Examples of facilitation payments are payments or gifts to speed up the procedures for certificates or licenses.



Each payment must be recorded and displayed accurately in the Company's books and records. Unilog is governed by the principles of transparency in financial matters.

### **Data protection**

Employees shall not disclose information that is not known to the general public for personal gain or for the benefit of someone outside of the Company. Such information includes technical data, financial data, operating data, customer information, memoranda or other information related to the company's operations, operating activities and future plans.

Employees shall comply with the relevant laws and regulations of the Company with respect for personal data, which requires employees to protect legal personal data as well as individual natural persons, including employees and customers.

## **V. Our social responsibility**

### **Communities**

We are committed to supporting local communities and recognize the need to contribute to their well-being. Moreover, respect and understanding of different cultures and the sensitive handling of their core issues is a high priority for us, as we build trust and credibility in our international environment.

We have and will continue to support community development as a sponsor of partnerships with non-governmental organizations and foundations in cooperation with our investment policy. We recognize that we are all rated based on our actions outside our workplace and that is why we call on our employees to respect the culture and civilization of people they cooperate with.

### **Environment**

We are committed to improving our environmental practices through precautionary measures and the use of environmentally friendly technology. We regularly evaluate our impact on the environment. By systematically identifying and leveraging potential green initiatives, we strive to support lasting improvements in our environmental performance and increase efficiency in our resources. This includes frequent environmental audits and risk management.

We want to measure processes and services with the highest quality standards. National and international environmental standards such as OHASS 18001: 2007 are going to be our guiding principles.

## **VI. Compliance, Derogations and Changes Procedures**

### **Contacts**

We recognize that you may need help in understanding the Company's policies, making difficult decisions, or helping the company comply with the Code of Conduct. There are several options to take action:

- Consult the Head/Supervisor
- Talk to the Director / Human Resources department



### **Reporting a violation**

If you realize a potential issue of non-compliance based on this Code of Conduct, we urge you to address to one of the above contacts.

For the security of an open working environment and to make your report more functional, please let us know your identity when reporting an offense.

No employee will be in any way disadvantaged for any attempt at good faith when reporting a potential issue in compliance with this Code of Conduct. All violations of the Code will be kept confidential. If required by applicable law, to provide information about the identity of the employee making the report, it may be communicated to the relevant persons involved in the investigation or subsequent legal proceedings. Any research will begin immediately.

### **Actions, derogations and changes**

In the event of non-compliance with the Code of Conduct, the Company will take action and allocate sufficient resources to properly address any issues. First and foremost, the Company will try to confirm the issue by explaining the importance of our values and motivating the employees involved to change behavior. However, employees who fail to comply with the Code of Conduct may be subject to disciplinary act, as stated in the relevant human resources policy manuals.

Is there a manual?

The Company will not grant exemptions from the requirements of the Code of Conduct without a good reason. Exemptions from the provisions of the Code will only be granted by the Board of Directors.

Unilog will review the Code of Conduct on a regular basis and the Board of Directors will decide on amendments as appropriate, whenever necessary.

