



# **BUSINESS ETHICS CODE**

**SOYA HELLAS S.A.****BUSINESS ETHICS CODE****CONTENTS**

1. Vision - Values - Purpose.....	3
2. Labour Relations.....	3-4
3. Compliance to the Current Legislation.....	4
4. Competition and Transactions Practices.....	4
5. Bribery and Corruption .....	4-5
6. Discrimination and Harassment.....	5
7. Health and Safety.....	5
8. Use of illegal Substances and Alcohol.....	5
9. Environmental Management.....	6
10. Employees' Files.....	6
11. Grievances Reporting Procedure.....	6

## **1. Vision-Values-Purpose**

Soya Hellas was founded in 1976 and ever since has followed a continuously expanding course and has established itself as one of the leading Greek industries in the agri business and food sectors.

It's main competitive advantage is the expertise of it's personnel, which serves as a guarantee of the high quality of products and services.

### **Our Customers**

The broad product range and the high standards of reliability, quality and services of Soya Hellas, enable the company to supply a wide range of busines sectors.

- a. Food industries
- b. Poultry and cattle breeders, fish farms, animal feed industries
- c. Chemical and bio-energy industries

### **Our values**

- Respect of human rights both of our internal and external corporate environment
- Commitment to excellence
- Equal treatment of all employees, irrespective of cultural background, sex, sexual orientation, age, religion political beliefs
- Protection of employees from sexual harassment, exploitation of personal data
- Strong corporate Social Responsibility
- Adoption of conduct based in commonly accepted moral values, such as honesty, integrity, devotion, compatibility

### **Purpose**

The purpose of the Business Ethics Code is not only to solve issues pertaining to ethical matters, but also to ensure compliance to the fundamental values of the company and to the legislation in force.

## **2. Labour Relations**

The relations between the company and its employees are based on common understanding of maintaining a spirit of cooperation and trust among them, thus it is the responsibility of both sides to respect and incorporate the business culture in all aspects and fields of work.

Child labour and human trafficking are explicitly prohibited. Also prohibited is working under the influence of drugs on any ground of the business entity.

Employees can freely appear to their directors or to the management for issues relevant to their work, without any fear of reprisals.

Any violent action or threat against employee or business associate is prohibited and personnel management shall be immediately informed.

Possible disciplinary punishments to employees are only those specified by the legislation.

The company has long made available a complaint box for anonymous reports from the part of personnel of incidents or issues relevant to working conditions and implements a policy against any reprisal due to reports submitted in good faith.

The company implements a policy of Ethical Business Practices and has been committed not to use, nor to tolerate any practices such as bribery, corruption or foul means in general. Responsible for the implementations of above are the Personnel and Plant Managers.

### **3. Compliance to the Current Legislation**

The company fully complies to the legislation in force pertaining to the protection of the environment and the hygiene and safety in the workplace.

The compliance to the legislation and the pertinent regulations is the basis for the ethical standards of the company.

The company's employees and executives are expected to maintain high standards of honesty, integrity and reliability in any sector of their business activity. Also, they are obliged to fully comply with the terms and the requirements of the company's By-Laws, approved by the Greek Public Authorities.

### **4. Competition and Transactions Practices**

The company pursues to reach its targets by having high performance, using lawful means and ethical business practices.

Each employee is expected to respect the rights of others and adopt fair conduct towards his colleagues, and as well as company's customers / suppliers / contractors /other business associates. It is not allowed to benefit from and use of any unlawful means, either by concealment or misrepresentation, or guiding of incidents, nor preferential information for own benefit.

Employees are encouraged to notify their directors of any action or situation that might lead to conflict of interest, so the issue will be resolved fairly and transparently.

Employees who during their task at work have access to confidential information, are not allowed to disclose or use this information for personal benefit.

### **5. Bribery and Corruption**

The company explicitly condemns any form of bribery and generally any form of unprofessional conduct.

For that reason, it is forbidden to any person of the company's personnel to act directly or indirectly, for private benefit.

Furthermore, employees are obliged not to take part in any activity or conduct that might give rise to suspicions of unlawful transactions.

Beyond the disciplinary sanctions that brings along, the \_against the company's rules-conduct such as offering or delivery of presents or any other kind of allowance to public service employees, political organizations, political parties, committees or candidates, is an offence according to company's policy.

### **6. Discrimination and Harassment**

Soya Hellas makes clear that it does not support nor tolerates during the process of hiring of personnel any discrimination due to race, colour, religion, sex, sexual

orientation, handicap or social class and provides equal opportunities for employment, remuneration, training, as well during the termination of employee relationship due to rescission, voluntary withdrawal or retirement, always in accordance with the labour legislation in force.

Moreover, it does not tolerate any type of forced labour, nor punishment through psychological violence and/or verbal harassment of the employees.

The company respects the human dignity and the human rights of the employees and commits itself to keep the working premises free of any illegal type of discrimination, verbal or physical assault, based on sex, colour, origin, nationality, political beliefs.

### **7. Health and Safety**

The company implements a system for Health and Safety in the workplace and provides it's employees a wholesome and safe working environment.

Moreover the company takes all appropriate measures for the avoidance of any accident by implementing practices that minimize possible hazards for the health and safety of personnel with continuous training and always maining a safe and hygienic working environment.

### **8. Use of Illegal Substances and Alcohol**

Soya Hellas maintains a sane work environment free from illegal substances and use of alcohol in it's premises. For this reason it is explicitly declared that it will not tolerate any incident of alcohol drink consumption, neither use nor sale of illegal substances inside the company's premises. It is also prohibited to anyone to arrive at work or to drive company's vehicles under the influence of alcohol or illegal substances.

### **9. Environmental Management**

Soya Hellas runs an Environmental Management System ISO14001 certified and makes clear to all personnel involved of the need of implementing this protocol. Energy savings, minimization of waste and running the premises at minimal emissions are at utmost importance.

### **10. Employees' Files**

Soya Hellas respects the employee's personal data and collects the information complying with the legislation.

These data are maintained with highest Standards of privacy, in personal folders and are treated as confidential, where only authorized personnel has acces.

### **11. Grievances Reporting Procedure**

Employees can appeal to their supervisors or to the company's management and can complain about any incident that may have come to their attention and could violate the company's policies.

Any employee who makes such a report or complain has nothing to fear about any of reprisal or unfavorable treatment due to this action.

In any case, whenever an employee does not wish to be exposed on a personal basis he can react anonymously by using into Complaint Box.

The “Business Ethics: Code and Practices” of the company are implemented by just everyone working in Soya Hellas and the disciplinary procedures are defined in the best possible way.

Any deviation to the above code incurs disciplinary punishments in relation to the seriousness of violation, not excluding a dismissal.