



Business Ethics Policy

December 2025

1. Purpose

Goldair Cargo S.A. is committed to conducting its business with the highest standards of ethical behaviour, integrity and transparency. This Business Ethics Policy sets out the principles and standards that govern the way the Company, its employees, contractors, suppliers and business partners operate, and provides the framework for ethical decision-making across all operations.

This Policy is aligned with international principles including the UN Universal Declaration of Human Rights, the ILO core conventions, the OECD Guidelines for Multinational Enterprises, the SEDEX/SMETA framework, and applicable Greek and European Union legislation.

2. Scope

This Policy applies to all employees, officers and directors of Goldair Cargo S.A., as well as to all contractors, suppliers, subcontractors, agents and business partners acting on behalf of the Company. All Company activities in warehousing, cargo handling, freight forwarding, logistics and transportation support are within the scope of this Policy.

3. Core Ethical Principles

Goldair Cargo S.A. operates according to the following core ethical principles:

3.1 Compliance with laws and regulations

The Company complies with all applicable national and international laws, regulations and standards in the countries where it operates, including labour, environmental, competition, tax, customs, data protection and anti-corruption legislation.

3.2 Customer focus and service quality

The Company prioritizes customer satisfaction and constantly enhances the quality of its services, in line with its ISO 9001:2015, ISO 13485:2016, ISO 22000:2018 and Good Distribution Practice certifications.

3.3 Zero tolerance for corruption and bribery

The Company maintains a zero-tolerance policy for bribery, corruption, facilitation payments and any form of unethical financial conduct, as detailed in the Anti-Bribery and Anti-Corruption Policy.

3.4 Respect for human rights and diversity

The Company respects the dignity and human rights of all individuals, avoids any form of discrimination, harassment or forced labour, and promotes equal opportunities and diversity across its workforce.

3.5 Health, safety and well-being

The Company prioritizes the occupational health, safety and well-being of its employees, as formally certified under ISO 45001:2018.

3.6 Environmental responsibility

The Company acts responsibly towards the environment, minimizing its footprint and contributing to climate action in line with its Environmental Policy, its Energy & Greenhouse Gas Emissions Management Policy and the Greek National Climate Law 4936/2022.

3.7 Data protection and information security

The Company safeguards customer, employee and business data through its ISO 27001:2022-certified Information Security Management System and its Data Privacy Policy, in compliance with the GDPR (EU 2016/679).

3.8 Transparency and accountability

The Company communicates truthfully and transparently with its stakeholders and publishes an annual Sustainability Report on its environmental, social and governance performance.

4. Roles and Responsibilities

Every employee, manager and business partner has a personal responsibility to uphold this Policy. Specific responsibilities include:

- Senior Management: to lead by example, provide the necessary resources, and ensure that ethical behaviour is embedded in the Company's culture.
- Compliance Officer: to oversee the implementation of this Policy, conduct regular reviews, and coordinate ethics-related training.
- Managers: to communicate expectations to their teams, address ethical concerns and take corrective action where required.
- Employees: to act with integrity, respect these principles, report suspected wrongdoing through the Whistleblower Procedure, and cooperate with investigations.
- Suppliers and business partners: to comply with the Suppliers Code of Conduct and apply equivalent standards in their own operations.

5. Training and Communication

Goldair Cargo S.A. provides regular training and awareness on business ethics, anti-corruption, whistleblowing and related topics. All new employees receive ethics onboarding, and all employees receive annual refresher training. The effectiveness of training is monitored through completion rates and periodic assessments.

6. Reporting Concerns

Any suspected breach of this Policy, of Greek or international law, or of ethical standards should be reported through the Whistleblower Procedure. Reports may be submitted in confidence to the

designated Receiving and Monitoring Officer (RMO), in accordance with Greek Law 4990/2022. The Company strictly prohibits any form of retaliation against persons reporting concerns in good faith.

7. Monitoring and Key Performance Indicators

The effectiveness of this Policy is monitored through the following KPIs (target value: zero incidents):

- Number of confirmed corruption or fraud incidents.
- Number of confirmed information security incidents.
- Number of confirmed cases of discrimination, harassment, child labour or forced labour.
- Number of substantiated whistleblower reports.
- Percentage of employees who have completed annual ethics training.

8. Consequences of Non-Compliance

Violations of this Policy may result in disciplinary action up to and including termination of employment, termination of contracts with suppliers or business partners, and, where applicable, notification to relevant authorities and legal proceedings.

9. Review

This Policy is reviewed at least annually, or sooner where significant operational, organizational, legal or regulatory changes occur.

10. Approval

This Business Ethics Policy is approved by Senior Management and communicated to all employees, suppliers, contractors and other relevant stakeholders.

Approved by:

Kallinikos Kallinikos



Vice President & Managing Director, Goldair Cargo S.A.

Date: December 2025