

Code of Conduct

This Code of Conduct applies to companies within the Zorbas Group and other affiliated companies.

The companies are:

1. A. Zorbas & Son Ltd
2. A.F. Athienou Farmes Gas Ltd
3. ZMK Iconvines Distributions Ltd
4. Meggitt Holdings Ltd
5. Cosino Ltd
6. Firata Ltd
7. Z.K. Food Ltd

Introduction

This Code of Conduct serves as a guide to behavior and the fundamental principles that govern the way we operate as a company. It defines the values, standards, and practices that we are required to follow in all our actions, from internal processes to external partnerships.

The Code applies to all employees and executives regardless of position or department. Every member of our team is responsible for acting with integrity, respect, and professionalism, promoting the company's values and protecting its reputation.

Compliance with this Code represents our commitment to our people, customers, partners, and society. Through its consistent application, we ensure a responsible, fair, and transparent business environment.

1. Human Rights

The company is committed to respecting, protecting, and promoting fundamental human rights in all its activities. Our conduct toward all employees, partners, and suppliers is based on the principles of dignity, equality, and respect.

Forced Labor

The company rejects all forms of forced, compulsory, or bonded labor. No employee shall work under threat, coercion, intimidation, or any form of compulsion.

Child Labor

The employment of minors below the minimum legal working age is strictly prohibited. We support children's right to education and protection from all forms of exploitation.

Non-Discrimination

Any form of discrimination based on gender, age, nationality, race, religion, disability, sexual orientation, gender identity, political beliefs, or any other characteristic is prohibited. All decisions regarding recruitment, advancement, and compensation are based solely on professional criteria.

Work Environment

Our company is committed to providing a safe, fair, and supportive work environment where every employee can work with dignity, respect, and equal opportunities. We promote a culture of collaboration, open communication, and mutual trust.

Health and Safety

The health and safety of employees is a priority. The company complies with all applicable safety regulations and implements preventive measures to avoid accidents and occupational hazards. We provide appropriate training, equipment, and guidance to ensure that every employee can perform their duties safely.

2. Business Integrity

Our company operates with complete transparency, honesty, and accountability in all business activities. We believe that integrity is the foundation of the trust we build with employees, customers, suppliers, and society as a whole.

Anti-Corruption and Anti-Bribery

All forms of corruption, bribery, extortion, or unfair advantage are strictly prohibited. No employee shall offer, request, or accept payments or benefits intended to influence business decisions. All transactions must be lawful and transparent.

Confidentiality and Data Protection

Employees are required to protect the confidential information of the company, its customers, and its partners. Personal data must be handled in accordance with privacy protection laws and with the utmost respect for information security.

Conflict of Interest

Employees must avoid situations where their personal interests may conflict, or appear to conflict, with the interests of the company. Any potential conflict of interest must be disclosed promptly to management so that appropriate transparency measures can be taken.

Use of Social Media

Employees are expected to use social media responsibly, respectfully, and professionally. Any post, comment, or sharing that relates directly or indirectly to the company must reflect the values and standards of conduct outlined in this Code.

The disclosure of confidential information, internal data, or any content that could damage the reputation of the company, its customers, or its partners is prohibited. Employees are encouraged to clearly distinguish their personal opinions from the official position of the company and to maintain respect toward colleagues and third parties.

Conclusion

This Code of Conduct operates in conjunction with the Employee Handbook. For any matter not addressed in this Code, the provisions of the Employee Handbook, as amended from time to time, shall apply in full.

The provisions of the Employee Handbook are binding on all employees, who are required to comply with them faithfully in the performance of their duties. The company reserves the right to amend, replace, or withdraw any provision or section of the Handbook at any time, informing employees accordingly following the relevant decisions.

Consequently, all employees are required to comply both with the provisions of this Code and with the policies, regulations, and guidelines contained in the Employee Handbook, as well as with the applicable laws and regulations of the Republic.