

Kinsen Hellas S.A.



Kinsen

// CODE OF CONDUCT

Values, policies and directives

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1. Message from the Managing Director

The on-going respect of the Values and Vision of our Company is absolutely necessary. The ever-changing environment in which we need to operate, making the right decision and acting in accordance with the Company's beliefs, can be challenging. This code of conduct intends to provide guidance and information relating to our Company's policies and procedures but primarily to its business ethics and spirit. It is based on our operating practices so that we can compete ethically and fairly under any circumstances. I urge all personnel to adhere to these standards. In this way, you will help us maintain the trust and respect that are essential for our Company's future success.

2. Responsibility and Violations

2.1 Responsibility to Be Informed and Follow our Code of Conduct

Saracakis Company of Companies is committed to fair business. This commitment to integrity requires each of us to act ethically. Each of us, on behalf of our Company, is expected to act with integrity, always and under any circumstances. We are expected to perform in a manner that protects and enhances our Company's reputation.

All personnel must know and comply with the ethics and policies of our Company and they are responsible to follow all legal requirements related to their work. In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

2.2 Duty to Report any Violations

Please keep in mind that violations of the law can expose our Company, and even the individual violator, to fines, penalties, and, in some cases, imprisonment. Additionally, violations could damage our Company's reputation. Anyone who violates the law may be subject to disciplinary action including release.

If you become aware of a known or suspected violation of a Company's policy or business-related legal requirements, you should report it promptly to one of the following:

- Your Manager
- Your Director
- Human Resources Manager
- Legal Manager
- Internal Audit department
- Executive Assistants

Rest assured that all reports are treated confidentially.

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

2.3 Whistleblowing Mechanism

The Company has established a Whistleblowing Mechanism for reporting breaches, cooperating with an external independent partner, ensuring the impartiality and integrity of the process. The mechanism is fully compliant with Law 4990/2022 and Directive (EU) 2019/1937, providing secure reporting channels, guaranteeing confidentiality, protection of personal data, and protection of reporting persons against retaliation, with the option to submit reports either anonymously or by name.

Employees and other interested parties may submit reports through the following channels:

- Electronic Reporting Platform
- [Kinsen](#)
- Email
- Telephone hotline
- Postal mail
- In-person meeting with the Whistleblowing Officer-Reporting Receipt and Follow-up Officer (R.R.F.O.)

3. Our Vision

Kinsen is the creation and shared vision of a group of European private investors and a Greek family with a long-standing presence in Greek business. The company's strategic goal is to actively contribute to the economic renaissance and development of our country, while at the same time, it has set a series of environmental criteria for the promotion of environmentally friendly solutions.

4. Workplace Environment

4.1 Basic Working Conditions

Overview

Saracakis Company of Companies relies on the knowledge, capabilities and the personal efforts of its personnel regardless of their position. The leading position of the Company in the constant changing competitive environment of the automotive market is a result of loyalty and teamwork of its staff. Its goal is to attract, develop and retain skillful staff investing in their professional development and rewarding their performance.

The personnel are expected to adopt the belief that smooth cooperation and commitment towards a common goal constitute basic factors for the success of the Company. The Company expects its people to exhibit professionalism, a customer-centered approach, patience and persistence, interest for continuous advancement, dynamism, flexibility and team spirit, in order to achieve the goal of top level customer services and secure its successful course in the automotive market.

Last but not least, our Company declares against child labour and forced labour.

Key objectives

- Providing competitive compensation and work hours, in compliance with the law
- Providing equal opportunities
- Respecting different ideas, perspectives, and beliefs

4.2 Anti – Harassment

Overview

A workplace that does not tolerate harassment or discrimination is a prerequisite to our having a respectful and inclusive work environment for which we are committed. Harassment includes language or conduct that may be derogatory, intimidating, or offensive to others. Discrimination includes disability, race, religious beliefs, sex, age and appearance. All of us, as well as vendors and other visitors to our premises, are protected and they are expected to comply with this. Violations will result in disciplinary actions including release.

Instructions

- Do not make jokes, use language, or participate in activities that may be offensive to others
- Do not intimidate others through bullying, threats, or practical jokes
- Discourage others from engaging in such behavior
- Take all harassment complaints seriously. Managers and supervisors should encourage a working environment in which everyone feels free to report potential violations

4.3 Health and Safety

Overview

Our Company is committed to providing reliable and high-quality products and services, with respect to the Environment, Health and Safety at Work (HSW), while meeting the requirements and expectations of our customers, including any relevant Legislative and Regulatory requirements.

In the context of implementing the Policy of Quality, Environment and Health and Safety at Work (Policy), our Company has developed, installed and implements an integrated Quality, Environment, Health and Safety at Work Management System (MS), which is based on and operates in accordance with the following principles:

Principles

- All actions that may affect the quality and the environment are planned and implemented in accordance with the established Procedures and the other documentation of the MS
- The systematic recognition, evaluation and control / management of all environmental aspects and effects from the operations of our Company
- The systematic recognition, evaluation and control / management of all risks regarding HSW, by minimizing these risks and adopting safe methods and operating procedures for the prevention of accidents and occupational diseases, both for normal/daily operations and for emergencies
- The systematic recognition, evaluation and management of all opportunities concerning quality, environment and HSW
- The continuous effort to prevent environmental pollution that may occur during the execution of our work
- The continuous effort to minimize the quantities of waste finally generated, by applying the best available recovery, reuse and recycling techniques, where possible
- The safe management of any hazardous waste that may appear during our Group's processes
- The effort to constantly reduce the consumption of natural resources and energy
- Informing our suppliers about this Policy and ensuring their compliance
- Creating and maintaining an open and creative relationship of trust with the local community and the public
- During the established review of the MS by the Management, our quality, environmental and HSW goals and objectives are revised, as part of our continuous effort to improve the quality of our products, services, environmental and HSW performance, customer satisfaction and the Management System (MS) as a whole,
- All employees are fully informed, and they participate actively in our implemented MS. They are informed concerning their responsibilities and tasks that arise from this implementation. All employees recognise that cooperation and communication between the Management and staff at all levels lead to improvements in the Policy, as active participation of staff in the formulation of improvement proposals is encouraged in every way.

For the Accomplishment of the Above, our Company:

- provides all the necessary means (materials, equipment, infrastructure, human resources and training) to achieve the objectives of Quality, Environment and HSW.
- has appointed a Management System Supervisor (MSS), who has the required authority and organizational independence, to ensure that the Management System implemented by the Company, operates and complies with the standards ISO 9001: 2015, ISO 14001: 2015, BS -OHASS 18001: 2007 and ISO 45001: 2018.

5. Gifts, Favors, Meals and Conflicts of Interest

5.1 Receiving Gifts

Overview

Each of us is expected to act in a way that promotes our Company's best interests. Personal relationships with suppliers, dealers, and customers must not affect your ability to act in a manner that is best for our Company. Those relationships must not harm our Company's reputation by creating the suspicion of impropriety. An advice could be to ask yourself how others might view your actions if they were reported to the Management or in the media. Accepting gifts or favors from a business contact could affect your judgment when making decisions on behalf of our Company, or it could be interpreted as a behavior through which this business contact is seeking favorable treatment.

Instructions

- Do not make personal investments or engage in collaborations with companies that are competitors, suppliers, customers or business partners of our Company. The same applies to your relatives and social circle. In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.
- Accept a gift or favor that is freely offered by a business contact only if its value is nominal, it involves a normal sales promotion, advertising, or publicity, and there is a legitimate business purpose. Indicatively, a gift valued up to the amount of €50 is considered of nominal value.
- Never accept any of the following types of gifts or favors:
 - Cash and loans
 - Discounts on goods or services, unless the supplier makes them generally available to all employees of our Company
 - Gift certificates (vouchers?) as they are considered cash equivalents

- Inappropriate gifts should be returned politely explaining our Company's policy. If it is not practical to return the gift or you are not sure if it is inappropriate, please consult any of the following:
 - Your Manager or Director
 - Human Resources department
 - Internal Audit department

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

5.2 Offering Gifts

Overview

Same as receiving gifts, offering gifts may harm our Company's reputation by creating the suspicion of impropriety. In order to prevent offering inappropriate gifts or favours to those who do, or seek to do, business with our Company, you should firstly ask yourself if the gift is part of normal and approved sales promotions or advertising and if it is of limited value.

Instructions

- You should avoid situations that could create the suspicion of impropriety
- If you are not sure if something you intend to offer is inappropriate, please consult any of the following:
 - Your Manager or Director
 - Human Resources department
 - Internal Audit department

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

5.3 Entertainment and Meals

Overview

Socializing with suppliers, dealers, and other business contacts can be helpful in cultivating a good working relationship, but there are limitations on what types of entertainment and social events are acceptable. You must always remember to act in a way that promotes our Company's best interests, and that protects its reputation. Social activities with business contacts must be appropriate and limited. You should only accept invitations that are business-related. You should never accept an invitation that would create a suspicion of impropriety. Although you may accept invitations from business contacts, please keep in mind that frequent acceptance of gifts or invitations (even if within limitations) may create a suspicion of impropriety.

Instructions

- You may accept a gift while at a paid event, as long as the gift is of nominal value. Indicatively, a gift valued up to €50 is considered of nominal value
- Use good judgment when you are offered gifts or invitations. If you are not sure if something you are offered is inappropriate, please consult any of the following:
 - Your Manager or Director
 - Human Resources department
 - Internal Audit department

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.

5.4 Conflicts of Interest

Overview

Each of us is expected to act in a manner that protects our Company's interests and reputation. It is desirable to have friendly relationships with suppliers, dealers, and other business contacts. Yet it is important to avoid conflicts of interest and circumstances that create the suspicion of impropriety. If you are in a business situation that may create a conflict of interest, review the situation with your Manager or Director. Finally, it is important to understand that conflicts of interest may concern yourself, your family members, or friends.

Instructions

- Do not make personal investments or engage in collaborations with companies that are competitors, suppliers, customers or business partners of our Company. The same applies to your relatives and social circle. In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.
- Certain relationships within our Company may compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness and favoritism. Thus, romantic, physical or familial relationships within our Company or between any of us and a business contact should be avoided.

5.5 Anti-Bribery

Overview

Bribery is prohibited in every kind of commercial transactions. The rule is one and simple to follow: Do not bribe anybody, anytime, for any reason.

6. Confidentiality and Use of Assets

6.1 Information Security

Overview

Information and systems used for processing, are important assets to our Company. Sustaining and/or expanding the market share and the general reputation of our Company depend directly on the information and the information systems. The most comprehensive information security issues presented here have been developed to protect information in general and to ensure the three basic and established principles:

- availability
- integrity and
- confidentiality.

Each of us must protect these assets, prevent any unwanted access to information and ensure the integrity and confidentiality of this information. We are all responsible for the protection of the information and for the going concern. The constant evolution of technology has created new realities and it offers wider markets and flexibility. The prevalence of the internet and the spread of e-commerce have created new risks. The expansion of computer networks offers flexibility to people of limited morals and dignity who could cause harm to our Company. Our employees' extra effort and constant perseverance in order to protect information is an important factor of success.

Instructions

- In any case you suspect that the Information Security of our Company has been violated, do not hesitate to immediately inform your Manager or Director as well as our Information Technology department
- Each of us must immediately report any loss of confidential, sensitive or personal information, as well as the slightest suspicion of disclosure to unauthorized third parties

6.2 Clear Desk

Overview

Sensitive or confidential data and information should not be exposed in the workplace when the office holder is absent. This directive includes data in electronic format (e.g. USB sticks, CDs, etc.) or data recorded in any other format (prints, handwritten notes, pictures, etc.). Below are some indicative instructions:

Instructions

- Sensitive or confidential information should be stored in a safe place when the office holder is absent. This information should be kept in the drawers or closets, which should be secured. If your drawers and closets do not have locks, please inform your Supervisor, Manager or Director
- Sensitive or confidential information that is no longer needed should be destroyed in the available document shredders. You should always confirm that you have not left any documents on the printers and fax machines
- Always secure your monitor, computer or laptop when you are away
- At the end of your work you should disconnect from all the systems you may be connected to and turn off your monitor, computer or laptop
- Always store securely any hardcopy folders, USB sticks, CDs or other media which may contain sensitive or confidential data and information

6.3 Use of Assets

Overview

Each of us is responsible for protecting our Company's assets and ensuring that they are used for business purposes and in accordance with our policies.

All electronic data stored on computers or similar assets are the property of the Company. The Company has the right to monitor or access documents on its systems at any time, within the limits of existing laws and agreements.

If you drive a corporate vehicle, you are required to be properly licensed and to operate the vehicle safely and in accordance with the law.

Instructions

- Use your laptops for business purposes
- Do not leave your laptops exposed to public or unsafe place
- Always back up your laptop data and keep it in a safe place
- Keep your laptop up to date with the latest antivirus software
- When traveling, carry your laptop as hand luggage
- Drive vehicles safely and in accordance with the law
- Any loss or suspicion of loss of other items belonging to our Company (e.g. access cards, corporate credit cards, corporate mobile phones, etc.) should be reported directly to our Human Resources department

7. Corporate Social Responsibility

The continuous changes that are taking place at a frenetic pace, such as global climate change, swelling social health and safety problems (Covid-19) bring to the forefront the need for the company's commitment to all stakeholders with whom it interacts.

For more information: [Corporate Responsibility - kinsen](#)

7.1 Developing a sustainable society

The company is committed to taking care of its people and the environment. In conjunction with green development, KINSEN is moving towards developing a sustainable environmentally friendly society by protecting every place where there is interaction.

For more information: [Corporate Responsibility - kinsen](#)

7.2 Policy on quality, environment and occupational health and safety

The commitment of the company's people is to provide reliable services and high quality products. Part of our vision is characterized by the company's policy, where it operates with respect for the environment, Health and Safety at Work (OSH).

For more information: [Corporate Responsibility - kinsen](#)

7.3 Quality, Environment, Health and Safety Management System

In order to achieve its vision, KINSEN has created a Quality, Environment, Health and Safety at Work (EHSSE) policy management system that will be monitored according to the European standards of the companies, ensuring them through the respective ISO certifications (see 9001 / 45001 / 14001) while ensuring all stakeholders belonging to the company's circle of influence.

For more information: [Corporate Responsibility - kinsen](#)

7.4 Policy on quality, environment and occupational health and safety

The company is committed to taking care of its people and the environment. The spearhead for the commitment to environmental protection is the commercial departments of the company where they promote the so-called green vehicles (electric – hybrid).

For more information: [Corporate Responsibility - kinsen](#)

8. Competition and International Trade

8.1 Fair Market Competition

Overview

Our Company respects free trade and market competition. It implements ambitious sales strategies in order to achieve customer satisfaction and seeks to engage in fair competition and transactions.

Our ideas

- We build relationships with dealers based on mutual trust, in order to nurture mutual growth and support for fair competition and transactions
- Our “customer first” philosophy creates a sale and service structure that promptly responds to the various needs of customers
- Our Procurement department evaluates candidate suppliers based on their overall strengths, including quality, technology, price, volume and reliability of delivery, as well as the stability of their business management and technological development capabilities

Instructions

- Do not share competitively sensitive information (e.g. prices, costs, market distribution, etc.) with competitors
- Do not enter a business arrangement with the sole purpose of harming a competitor
- Do not agree with competitors to boycott a supplier or customer
- Do not agree prices with suppliers while evaluating candidate suppliers

8.2 Prohibited Transactions

Overview

European Union has adopted regulations that restrict exports and transactions with certain countries, entities, and individuals. These trade restrictions limit or prohibit transactions with certain designated individuals and entities, as well as with certain sanctioned countries, currently including Iran and North Korea. To help avoid the risk of engaging in prohibited transactions, each business activity must first determine if intended transaction is appropriate for its activity (see instructions below). Violations of these regulations could hurt our Company’s reputation and subject it and the individuals involved to heavy penalties and fines. We, as a Company, must comply with these trade restrictions.

Instructions

- Always consult the updated sanctions map: <https://www.sanctionsmap.eu/#/main>
- Make sure you are not exporting to a prohibited destination
- Be sure you have performed a business review to determine if transaction is prohibited
- If the above process identifies a transaction that must be rejected or blocked, you must report it immediately to your Director, as well as our Internal Audit department

8.3 Money Laundering

Overview

Everyone must follow our policies and procedures that have been developed to avoid involvement in any money laundering scheme, and to ensure that our Company complies with regulatory framework. Money laundering is the use of transactions by criminals, terrorists, or others to conceal the illegal source of the funds. Money laundering involves transactions which, when completed, appear to be legitimate. The actions of even one person in our Company in assisting with money laundering, even if acting on his or her own, could subject our Company to penalties and hurt its reputation.

Instructions

- Look for any suspicious transactions
- Any suspicious activity should be reported promptly to one of the following:
 - Your Manager
 - Your Director
 - Human Resources Manager
 - Legal Manager
 - Internal Audit department
 - Executive Assistants

Rest assured that all reports are treated confidentially.

In case of any doubt, we strongly recommend you consult with the Management to receive all necessary clarifications.