



**MATHIOS**  
REFRATORIES S.A.

# Code of Ethics and Conduct

## Colleagues, partners & alliances,

Our basic principles, our beliefs, our corporate culture, our business ethics and above all our voluntary ethical commitments, are a critical pillar of the operation of the MATHIOS REFRACTORIES SA in the whole range of our activities and remains unchanged over time.

This Code reflects and strengthens these fundamental principles and creates an agreed and transparent framework of operation and conduct, which should be respected by both us and our partners, subcontractors and suppliers. The Code will always remind each of us, but will also help each new employee or partner in general to understand the environment in which he must be integrated and the general culture of cooperation with our Group that he should develop.

The conscious acceptance and application of the Code of Ethics & Conduct of the MATHIOS REFRACTORIES SA, is valid from time immemorial and ensures the creation of a working environment based on a value system, which promotes mutual trust, transparency, cooperation, recognition, integrity, equal opportunities and motivation for progress and which distinguishes the skills and personality traits of each person, contributes to overcoming personal and interpersonal difficulties, promotes the innovation of thoughts and actions based on the present achievements and ultimately creates a sense of security and meritocracy for all employees in a modern environment.

Most of the code of ethics practices, as stated following in detail, have been already applied in our daily operations. What is left will be shortly included in the whole spectrum of our business.

Each of us should take the time to read and understand the Code and to be a conscious ambassador of its principles and values.

The support and contribution of each of us is crucial for the sustainability of MATHIOS REFRACTORIES SA and its employees and for the achievement of all the goals of the Company and its people. Our strength is our people and our corporate values.

The Code of Ethics & Conduct is an ethological source of collective wealth.

## Introduction

### Why do we need a code of conduct?

The Code of Ethics and Conduct is the basic framework of Principles and Values that should characterize the professional behavior of all people of MATHIOS REFRACTORIES SA and, by analogy, in all companies of the MATHIOS REFRACTORIES Group, after its adoption by relevant decisions of the Boards of Directors and govern our relationships with our colleagues, our customers, our suppliers and our partners. Knowledge, respect and observance of the Code are the duty of everyone and every level of work, from the construction site to the Administration.

#### **The implementation of the Code ensures:**

- Transparency in the relations and activities of MATHIOS REFRACTORIES SA.
- The satisfaction of the expectations of the customers, the users of our projects and the wider social ensemble that benefits from our projects and our services.
- A safe, healthy and friendly work environment for all our employees with respect of human rights and human values.
- Relationships of mutual trust and respect with our suppliers and partners.
- Respect for the environment and the activation of MATHIOS REFRACTORIES SA in the context of sustainable development.
- The protection of the material and intellectual property of MATHIOS REFRACTORIES SA.
- The compliance of MATHIOS REFRACTORIES SA and its subsidiaries with the current regulatory framework in all countries of its activity.
- The adoption of practices and behaviors in accordance with the voluntary commitments that govern MATHIOS REFRACTORIES SA from the beginning of its establishment.

The Code protects all of us from adopting or suffering inappropriate or illegal behavior and helps us realize that such behaviors endanger the human values and interests of MATHIOS REFRACTORIES, our employees and our society.

The content of the Code is in accordance with the general principles provided by the International Regulations and Conventions as well as by the international standards ISO 9001, v.2015.

The Code is approved and enters into force by the Board of Directors of MATHIOS REFRACTORIES SA as well as all its amendments or additions and is published on its website

## How do we use it?

**The Code is a point of reference for all of us in such a way that:**

- Guides us in the way we lead our job.
- Sets the framework for defining more detailed rules and manners.
- Serves as an answer to dilemmas and questions that arise during the execution of our work or in relation to it.
- Stands as reference in case we doubt how we should act.
- Lays the foundation of the Company's principles and culture.

This Code regards all the subsidiaries and all the fields of activity of MATHIOS REFRACTORIES SA in every country which is active and is taken into account in all Partnerships and Joint Ventures that the Company might participate.

The content of the Code is not exhaustive, but includes the minimum requirements that must be applied and which are supplemented by Policies, Procedures and other internal documents (eg Regulations, Instructions) of MATHIOS REFRACTORIES SA, which are equally binding for all of us.

## What obligations do arise?

### Employees

**All employees should:**

- Have read and understand the Code and the related Policies and Procedures.
- Operate and work behaving at least according to its Principles and Values.
- Immediately inform the Head of Regulatory Compliance in case they notice deviations from the application of the Code.
- Participate in the trainings conducted on the topics of the Code.

### Managers

**All the Managers should:**

- Lead by applying the Principles and Values of the Code.
- Remain vigilant for the correct application of the Code to our staff, suppliers and partners in our area of responsibility.
- Encourage staff to actively participate in training activity related to the adoption and use of the Code of Conduct, this way setting the example.
- Encourage employees, suppliers and partners to report discrepancies or questions on the Code.
- Create a working environment that meets the requirements of the Code.
- Ensure that the Policies, Procedures and other documents of MATHIOS REFRACTORIES SA comply with the Code.

## Partners and Suppliers

All partners and suppliers of MATHIOS REFRACTORIES SA are informed about its existence and content

- Partners and suppliers are encouraged to:
- Read and understand the Code, which is posted on the company's website.
- Include a relevant article about the knowledge and acceptance of the Code in each of their contracts with MATHIOS REFRACTORIES SA.
- Operate and work based on its Principles and Values.
- Immediately inform the Head of Regulatory Compliance in case they notice deviations from the application of the Code.

Mathios Refractories employees, partners and suppliers are obliged to comply with the Regulatory Framework in each of the countries where the company operates. Ignorance of the Regulatory Framework is regarded unacceptable, particularly if it directly affects work. Failure to inform both top management and the head of regulatory compliance of any related issues and/or deviations constitutes a significant violation of duties and responsibilities.

## Monitoring the application of the Code

Responsible for monitoring the implementation of the Code is the Head of Regulatory Compliance.

The implementation of the Code is supported by the Rules of Procedure and other relevant documents, which describe the mechanisms of monitoring and regulating the Code, as follows:

- Engaging inspections in the whole spectrum of activities of MATHIOS REFRACTORIES SA and suppliers and partners.
- Encouraging the reporting of deviations or questions.
- Inspecting the above reports at the highest level of Management.
- Measurement and monitoring of compliance indicators or actions.
- Official reports and reports on the issues of the Code at the highest level of Administration.

## Training, support and counseling

MATHIOS REFRACTORIES SA is responsible for the education and information of the employees through the training of targeted educational and informative actions or programs as well as the use of information tools.

The Code is made known to the employees upon their hiring. Principle associates, and suppliers are informed that the Code is uploaded on the website of MATHIOS REFRACTORIES SA at the beginning of the partnership with the Company. The acceptance of the Code is done with the signing of the respective contract (work or cooperation with freelancers of any specialty), where a relevant paragraph will be included.

In case you have questions or need clarifications regarding the application of the Code in your field of activity, do not hesitate to contact your Supervisor.

In case it is not possible to contact your Supervisor or if you are not satisfied with his answers, you can contact the Regulatory Officer, who will guide you in any questions and concerns.

## Reports and complaints

We are obliged to inform MATHIOS REFRACTORIES SA for any deviations or concerns for possible deviations in the application of the Code, which come to our notice, through a personal, printed letter to the Compliance Officer.

For discrepancies or concerns about corruption and bribery for the company, reports are accepted that are sent anonymously or electronically to the address [compliance@mathios.gr](mailto:compliance@mathios.gr)

For all other issues, reports of discrepancies or concerns about potential discrepancies in the application of the Code that are sent anonymously or electronically, will not be considered.

MATHIOS REFRACTORIES SA, through the relevant authorized persons at the management level, who have either been appointed by a practical Board of Directors or have been authorized with executive responsibilities, investigates and evaluates any complaint it receives and determines, where necessary, corrective actions within the current legislation and of. It is the responsibility of all of us to work with the Regulatory Officer during the investigation phase.

The Management of MATHIOS REFRACTORIES SA takes all the necessary measures to ensure the anonymity and confidentiality of the personal data of each employee who makes such reports, as well as his protection from retaliation.

## Retaliation is absolutely unacceptable

MATHIOS REFRACTORIES SA will in absolutely no way accept cases of retaliation to the employees, who have made reports on the issues of the Code.

Retaliation can include threats, intimidation, exclusion, degrading treatment, malicious comments and behavior, etc.

In the event that such behavior has come to our notice, we will immediately report them following the mechanism as stated above.



## **Consequences on non-compliance with the Code of Ethics & Conduct**

MATHIOS REFRACTORIES SA evaluates any deviation found in the application of the Code and takes all the legal actions provided by the current institutional framework and the Labor Code, such as termination of cooperation, imposition of a fine or criminal clause, activation of civil and criminal proceedings, etc.

Failure to inform our Director and the Head of Regulatory Compliance for any deviations of third parties in matters of Regulatory Compliance, is a significant breach of our duties and responsibilities, which entails the corresponding penalties.

## **Constant improvement**

The constant integration of new requirements, views and perceptions in the provisions of the Code is considered critical, so that the Code is constantly responding to the new data and challenges of each era.

In case you have suggestions for improvements or comments on the content of the Code, you can contact the Regulatory Officer.

## **Head of Regulatory Compliance**

The Head of Regulatory Compliance is responsible for monitoring the correct implementation of the Code of Ethics and Conduct of MATHIOS REFRACTORIES SA.

His responsibilities are described in detail in the Code of Ethics and Conduct.

The Head of Regulatory Compliance is appointed by the Board of Directors of MATHIOS REFRACTORIES SA and refers to the Supreme Management or as defined in the Internal Rules of Operation.

## Our values as part of our strategy

### Vision

Our vision is to be one of the most important Greek companies of Refractories and Building Materials with a strong local and international presence in a wide range of activities, including the sectors of research and development, production, procurement, trading, selling and installing. We want to always be proud of the work we deliver, of the citizens' approval of the result and with our work to be useful to society.

We want to add value to our customers and suppliers through integrated projects and first-class products that meet the most demanding international standards of quality, safety and sustainable development.

#### **In order to realize our Vision we are committed to:**

- constantly striving for the best result in the quality of our works, contributing in sustainable development.
- expanding the scope of our activities.
- continuous evolving our employees.
- providing our employees with a safe working environment.
- establishing mutually beneficial relationships with our partners and suppliers.
- operating in terms of sustainability and respect for the environment.
- providing social work and supporting the local communities where we operate within the framework of Corporate Social Responsibility that we implement.

## Values

Our Values are reflected in five (5) basic axes:

- Organization - Corporate Culture
- Customers / Partners / Suppliers
- Employees
- Society
- Environment

For each axis, the basic principles observed and advocated by MATHIOS REFRACTORIES SA are analyzed.

## Our scope of business - Activity

According to our beliefs, our projects and activities reflect our Values and demonstrate our commitment to business ethics.

Therefore, our projects and activities not only satisfy the requirements and specifications of our customers, but stand as a point of reference for their quality, safety and reliability.

**How do we stand up for that:**

- Focus on the needs of customers and users
- Emphasis on safety, quality and reliability
- Use of best international technical practices
- Compatibility of international regulations and standards
- Data privacy protection

## Our people

The people of MATHIOS REFRACTORIES SA play the most important role for its success. That is why we have created and continuously improved a working environment characterized by respect, transparency, equal opportunities, justice and security.

### How do we stand up for that:

- human rights: differentiation, integrity and dignity
- employment relationships and practices
- observing hierarchy and organization chart
- equal opportunities
- harassment in the workplace
- workers' health and safety
- conflict of interests
- relations with political parties
- privacy

## Our Customers

We pursue long-term relationships based on trust with our customers. They are connected with the existence of MATHIOS REFRACTORIES SA.

For this reason, just as our projects are characterized by quality, safety and reliability, so are our customer relationships characterized by transparency, honesty and ethical principles.

### **How do we stand up for that:**

- healthy competition
- honesty
- gifts, meetings, sponsorships and donations
- fight against corruption and bribery
- dispute money laundering
- communication and public relations
- corporate image

## Our partners

Our partners are an important parameter for the sustainable development of MATHIOS PYRIMACHA and its operation with rules of business ethics. Our partners influence in many cases the result of our work as well as our corporate image and reputation. MATHIOS REFRACTORIES requests all relationships with its partners to be transparent and mutually beneficial, in order to ensure healthy and long-term cooperation with them.

### How do we stand up for that:

- shareholders and investors
- third parties
- partners and suppliers
- selection of suppliers and partners and continuous evaluation based on strict criteria
- transparency in transactions between the companies of the Group to which MATHIOS REFRACTORIES SA belongs

## Local authorities and society

MATHIOS REFRACTORIES SA treats local communities with respect as it considers them to be critical for the success of its projects. The mutually beneficial relationship with them is the Policy of MATHIOS REFRACTORIES SA.

### How do we stand up for that:

- involvement of the local community
- communication with the local community and contribution to the local
- growth and economy

## Sustainable Development and Environment

Wherever MATHIOS REFRACTORIES SA is active, it always takes the protection of the environment seriously, strictly following the current environmental legislation.

The Company is also active in such a way as to reduce its energy footprint and enhance sustainable development with respect for the future of future generations.

**How do we stand up for that:**

- Protection of the environment
- Decreasing energy and water consumption
- Commitment to future generations

## Protection of our Property

The assets of MATHIOS REFRACTORIES SA are a key component for the creation of a working environment that will have all the necessary resources for its efficient operation.

The assets of MATHIOS REFRACTORIES SA include tangible objects such as buildings, mechanical equipment, cars, computers, telephones as well as intangible objects such as internet services, copyrights, etc.

**How do we stand up for that:**

- respect and proper use of assets
- proper and institutionalized use of network, intranet and information systems
- integrity of financial data and reports
- confidentiality - data protection
- secure electronic communications
- business cards for financial transactions





[mathios.com](https://mathios.com)