



CODE OF CONDUCT FOR BUSINESS PARTNERS

ISSUE 2 | September 29, 2025
Approved by the BoD Decision No. 904/29-09-2025

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INTRODUCTION

Since its establishment in 1984 by Dr. Georgios V. Apostolopoulos, "IATRIKO ATHINON E.A.E." (ATHENS MEDICAL CENTER S.A.) has been committed to operating responsibly towards people and society, providing top-quality and innovative primary and secondary healthcare services in accordance with the most rigorous international standards and certifications.

Furthermore, 40 years after its founding, the Company and its subsidiaries, collectively forming the IATRIKO ATHINON Group, have now fully integrated into their business operations the internationally recognized principles, standards, and values of business ethics, sustainable development, environmental protection, and respect for human rights.

This Code summarizes the values, principles, and standards of ethics and conduct of the Company and the IATRIKO ATHINON Group, which all Business Partners are expected to adhere to.

Business Partners include individuals or organizations that provide services, work, or products to the IATRIKO ATHINON Group.

This Code of Conduct for Business Partners of the IATRIKO ATHINON Group is not intended to replace existing Business Partner policies, however, it must be observed and complied with by all third parties conducting business with any company of the Group, including suppliers, contractors, and individuals providing works, services, or products.

1. MAIN PRINCIPLES AND COMMITMENTS

The IATRIKO ATHINON Group, in full compliance with national and international law, adheres to and applies standards of integrity and ethics in its business activities and operations, as defined (indicatively) by:

- The Universal Declaration of Human Rights ([UNIVERSAL DECLARATION OF HUMAN RIGHTS - United Nations Regional Information Centre - Greece \(unric.org\)](#))
- The Principles of the [UN Global Compact \(Ten Principles of the United Nations Global Compact - Global Compact Network Greece\)](#).
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (Law 1342 of April 1, 1983).
- The United Nations Guiding Principles on Business and Human Rights ([Intro Guiding PrinciplesBusinessHR.pdf \(ohchr.org\)](#)).
- The global Sustainable Development Goals ([Agenda 2030-UN Regional Information Center - Greece \(unric.org\)](#)).
- The fundamental principles of the Greek Constitution.
- The United Nations Convention against Corruption.
- The Corporate Governance Principles of the Organization for Economic Cooperation and Development (OECD).

2. REQUIREMENTS FOR SUPPLIERS

The IATRIKO ATHINON Group expects its Business Partners to adopt the following conditions and principles in their business practices and operations by implementing corresponding Policies, Procedures, and controls:

2.1 Integrity and respect in commercial transactions

Business Partners in any transaction with the IATRIKO ATHINON Group are required to comply fully with the entire legislative and regulatory framework governing their operation, refraining from any act of improper or unethical business practice or conduct.

2.2 Safeguarding human rights

The Business Partners of the IATRIKO ATHINON Group are committed to safeguarding human rights through:

- prohibiting child and forced labor
- adherence to working hours
- upholding the right to fair remuneration
- avoiding discrimination (such as that related to race, religion, age, sexual orientation, disability, nationality/citizenship, union membership, social and economic status)

2.3 Adoption of health and safety measures at work

The priority of the IATRIKO ATHINON Group is to provide a modern working environment that respects people and labour rights, promotes trust, team spirit and efficiency.

The IATRIKO ATHINON Group takes measures to continuously maintain and improve a working environment that provides health and safety for all employees through a comprehensive system of effective monitoring, prevention, and management of risks related to its work and overall activity.

In addition, the Group has zero tolerance for malicious or offensive behavior, intimidation, violence, and harassment in the workplace, with the aim of creating a safe working environment with equal opportunities.

The Business Partners of the IATRIKO ATHINON Group are committed to implementing in their own work environment respective systems and policies for health and safety, combating violence and harassment at work, risk prevention and management, and ensuring an optimal working environment.

2.4 Refraining from acts of influence / Prohibition of bribery – Acceptance of bribes

The IATRIKO ATHINON Group recognizes the offering of gifts of courtesy and hospitality as an integral part of business practice and culture, provided that they are within the bounds of social courtesy and communication, are of small, symbolic value, are offered transparently and reasonably, and are not offered repeatedly to the same person. symbolic value, offered transparently and reasonably, and not on a recurring basis to the same person.

The provision or acceptance of gifts, hospitality/entertainment, and any other benefits related to the performance of duties and intended or likely to create the impression that they are intended to induce any obligation, the creation or maintenance of a business advantage, is expressly prohibited. It is also expressly prohibited to give or receive gifts and hospitality to/from government officials and public servants, as well as monetary donations to any political party.

The Business Partners of the IATRIKO ATHINON Group must respect the Group's current Ethics and Anti-Bribery and Corruption Policy, by implementing similar policies and committing to comply with all laws and regulations for combating corruption and bribery.

2.5 Avoiding conflicts of interest

The Business Partners of the IATRIKO ATHINON Group must comply with the applicable legislation on conflicts of interest and take the necessary measures that constitute or may lead to a conflict of interest.

2.6 Sustainable Development and Environmental Protection

The Business Partners of the IATRIKO ATHINON Group must comply with the laws and regulations on sustainable development and environmental protection and are called upon to take all appropriate measures to minimize the negative impact on the environment where they operate, by adopting environmental management programs, promoting environmental culture, social solidarity, and corporate governance.

2.7 Keeping financial records

The Business Partners of the IATRIKO ATHINON Group are expected to maintain complete and accurate financial, administrative, and other data and records, in full compliance with recognized accounting standards, applicable laws and regulations, and accounting rules.

2.8 Compliance with competition rules

Business Partners must operate in accordance with the rules of free and fair competition and refrain from any acts or omissions that may damage the reputation, prestige, and credibility of the Group.

2.9 Protection of information and personal data

Business Partners must comply with applicable laws on the protection of personal data and information security.

2.10 Intellectual Property Rights

Business Partners must protect trademarks, domain names, logos/symbols, distinctive features, policies, procedures, databases, and publications that are part of the Group's assets.

2.11 Monitoring of international economic sanctions regulations

The IATRIKO ATHINON Group ensures that it monitors and complies with the applicable legislative and regulatory framework for dealing with cases involving violations of international regulations, prohibiting any cooperation with economic entities/organizations or presence in countries linked to terrorist activities, drug and arms trafficking, and human trafficking.

3. PROVISION OF INFORMATION – RIGHT OF CONTROL

Any Business Partner that does business with the IATRIKO ATHINON Group must provide, upon request, the information that documents its compliance with this Code.

The IATRIKO ATHINON Group reserves the right, either through any of its companies that does business with a specific supplier/business partner, or through an external auditor, to conduct an audit for the purpose of assessing compliance with this Code. Business Partner, or through an external auditor, to conduct an audit of the latter in order to assess its compliance with this Code.

4. MONITORING AND REPORTING

The IATRIKO ATHINON Group expects its Business Partners to report any concerns or comments they may have regarding any malfunctions or omissions that have come to their attention with regard to compliance with policies and procedures and compliance with the legislative and regulatory framework.

Submission of questions & complaints

Any issue or question regarding this Code and its application, as well as any report/complaint of an actual or alleged violation, may be submitted anonymously or by name:

- (a) Using the online platform at the following address: <https://app.myethos.eu/mailbox/d979fa28-49d6-439f-a52e-dfb7306f23fb>, following the relevant instructions on the platform.
- (b) Verbally, through a personal meeting with the Group's Report Receipt and Monitoring Officer (Y.P.P.A.), which (meeting) must be scheduled within three (3) working days, following a relevant request by the reporter.
- (c) In writing by sending an email to the following email address:
yppa@iatriko.gr
or alternatively to the email address:
compliance@iatriko.gr
- (d) In writing by sending a letter to the following address:
Delphon and Sarantaporou 1, Marousi, Attica,
Attn: Regulatory Compliance Officer / Reports Receipt and Monitoring Officer – ERAKLEIA PEPPA
marked "CONFIDENTIAL."

5. APPLICATION OF THE CODE OF CONDUCT – CONSEQUENCES OF NON-COMPLIANCE

This Code of Conduct for Business Partners has been approved by the Board of Directors of IATRIKO ATHINON E.A.E." (ATHENS MEDICAL CENTER S.A.) and applies to all companies under its control. The Business Partners of the IATRIKO ATHINON Group undertake to comply with this Code, which they are deemed to have read and understood upon signing any agreements/contracts relating to their transactions with the companies of the Group, which refer to the basic provisions of this Code and the requirements of the Business Partners, as well as by its publication on the Company's website.

Any violation by the Business Partners of the IATRIKO ATHINON Group of the principles and commitments set out in this Code entitles the contracting company of the Group to terminate any agreement/contract with immediate effect upon delivery of the relevant document to the other party, subject to compensation for any damage resulting from the above violation.

It should be noted that the Group reserves the right to amend this Code.

ANNEX I: HISTORY OF THE ENTRY

Date of Issue / Revision	Issue Number	Details of Changes	Approval	Date
09-04-2024	1 st		BoD No. 842	09-04-2024
29-09-2025	2 nd		BoD No. 904	29-09-2025

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