

# CODE OF CONDUCT



**THREE SHIELDS**



The Company has drafted and implements a Code of Conduct “**THREE SHIELDS**”, which clearly sets the basic standards of business practice and behavior the Company is committed to follow and uphold. Synergy’s Code of Conduct “**THREE SHIELDS**” is based on three pillars: **Transparency - Confidence - Quality**, the three core values that seal every day’s operation and protect Company’s relationships with its Clients, Partners and Personnel. The Code of Conduct is not a fixed set of rules, but is being continuously improved to always respond to the current conditions of the market and society.

## 1. SCOPE

Observance of the regulatory and legislative framework, as well as of the standards and rules of ethical behavior and ethics constitutes a fundamental element of the Company’s culture. The scope of this Code of Conduct is to communicate the ethical principles and values the Company accepts and implements, in order to ensure its reputation, prestige and credibility, through the creation of practices and rules of business ethics and professional conduct.

## 2. BASIC PRINCIPLES

### 2.1 Compliance with legislations

The Company complies with the laws of the countries in which it operates or provides its services.

### 2.2 Business Behavior

The Company aims to maintain a high level of professional ethics both among its Employees, its Clients, Suppliers, Associates, Banking Institutions and other Government Offices. In this context, the Company is committed to:

- Establish an Engineering Transparent Logic in all its business activities,
- Maintain character integrity at all levels,
- Conduct honest and transparent transactions both internally and with other companies,
- Ensure high quality and adequacy in the provision of services,
- Comply with all legislative and internal regulations,
- Develop and maintain relationships of trust.

The Company is committed to providing its clients with consistent, high quality logistics services. At the same time, it is committed to the continuous improvement of its services and the implementation of innovative initiatives, in order to upgrade its services and the business value of its clients.

### 2.3 Customer Service

The main focus of the Company’s culture is to contribute in the achievement of its clients’ business goals. The Company aligns and dynamically adjusts to the business goals of each customer and adopts a series of measures to ensure the exceptional “Customer Experience”, through efficiency and continuous improvement:

- Of its defined performance indicators and constant information provided to the customer,
- Of the mechanism for recording failures, immediate response and timely resolution of issues that may arise,
- Of the specialized employees that manages the specifics of each customer project,
- As well as through strict observance of its contractual obligations towards its Clients, both in terms of the provision of logistics services and in their financial relations.

### 2.4 Transparency in the Financial Relations

The agreement and the acceptance of the relevant contract, regarding the obligations of the Company and the Client, both for the provision of services and for the financial terms, is a precondition for starting each project. In the context of ensuring the financial terms agreed with its clients, the Company undertakes that:

- All charges to Clients will be based on the signed contracts and each invoice will be accompanied by detailed analysis, which will enable the Client to check and fully verify the charges.
- Any price change must be previously communicated and accepted by the Client.
- In case of any failure/incorrect billing, it will be rectified immediately by the Company.

### 2.5 Confidentiality and Security of Systems and Information

Confidential is the information that is not publicly available and is obtained by employees members as a result of their employment relationship with the Company and may relate to the Company, Clients, other persons involved (Clients’ customers) or other associates.

The Company is committed to ensuring the confidentiality and protection of information concerning Clients (or Clients’ customers) and other associates. All sensitive information is treated with utmost confidentiality.

The Company adopts Non-Disclosure Agreements with its Clients, Associates and Suppliers, while at the same time it has signed confidentiality agreements with the Employees that due to the nature of their work have contact with confidential/ sensitive information.

The Company has taken all the necessary steps to secure the systems it uses to carry out its operations by external agents, while implementing the system of restricted access to data by authorized users.

Restrictions on maintaining the confidentiality of information also apply to outsourced associates, both during the period of the business relationship and after its termination.



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## 2.6 Personal Data Management

The Company maintains a mechanism for the protection of personal data concerning its employees, associates and third parties (Clients' customers), being fully aligned with the current institutional framework.

The Company has drafted a General Data Protection Regulation (GDPR) and has appointed a Data Protection Officer, who is responsible for overseeing the strategy and implementation of data protection, in order to ensure the compliance of the Company with the requirements of the GDPR.

## 2.7 Behavior in the workplace

The Company has taken measures to prevent any offensive behavior between employees' members, which aims or results in the insult of a person's dignity, especially when this behavior creates an environment of intimidation, degradation or aggression. Employees' members, as well as other associates (and their associates) should behave with dignity and courtesy inside and outside the Company.

The Company employees should behave politely both among each other and during any transactions outside the Company: Clients, Clients' customers, Suppliers, External Associates.

## 2.8 Safety at work

The Company ensures a safe working environment for all its employees, by applying strict procedures that exceed the statutory measures. The Company has integrated in its operations every modern means for the Health & Safety of its employees, while it is constantly alert regarding the employees' continuous information and training. The rules for the protection of health and safety also apply to third parties who are at the Company premises for work or visit. The Company's commitment to the application of the strictest Health & Safety standards is certified with OHSAS 18001: 2007/ELOT 1801:2008.

## 2.9 Dress Code and Appearance

Employees' members are required to take care of their personal hygiene and maintain a professional and decent appearance in any case, and in accordance with the dress code applicable in their work department.

## 2.10 Embezzlement and Bribery

The Company has taken all necessary measures to prevent and avoid cases of embezzlement and bribery. Through its procedures, the Company has included internal control systems in all its operations, in order to prevent and detect any attempt or act of corruption. Internal control processes and systems are constantly evaluated, reviewed and improved, so that they always meet the needs of the Company and its Clients.

## 2.11 Fraud

Fraud is the act or omission of a person who damages foreign property, so as to obtain the same or a third illegal property benefit.

The Company implements and monitors the appropriate policies, mechanisms, procedures and security processes, designed to assess, prevent and remedy issues related to fraud and malicious behavior.

## 2.12 Working conditions

The Company ensures that:

- Any decisions regarding recruitment, remuneration, benefits, and promotions are solely based on the skills, abilities and performance of the employees,
- There are equal opportunities for internal development, through a structured evaluation system,
- The agreed working hours are observed,
- The Company provides employees with a safe and decent work environment.

## 2.13 Diversity and equal opportunities

Respect for human dignity and equality at work is greatly promoted by the Company. The Company promotes the principle of equal opportunities for all its staff members during recruitment, training, working conditions, remuneration and promotion, regardless of age, gender, religion, nationality.

## 2.14 Conflict of Interests

The Company prohibits the involvement of employees' members in the activities of other organizations or entities, whose professional activity conflicts with the interests of the Company and/or its clients. Any such involvement must be approved in advance by the CEO.

## 2.15 Sustainable Development & Environmental Policy

The Company maintains a high sense of responsibility for society as a whole, its employees and the environment, which is reflected in a series of ongoing actions, activities and programs for humans and the environment. The Company, through the design and implementation of policies and actions, which aim at the coexistence of its economic development, environmental protection and social cohesion, contributes to the creation of those conditions that will ensure long-term economic development while protecting the environment.

The Company is committed to conducting its activities with respect for the environment and human health, being fully aware of its social and moral responsibilities.

## 2.16 Competition

The Company perceives the concept of competition as a constructive challenge and a measure of comparison, with the ultimate goal of continuously developing and improving. The Company aims at the continuous development of its business activities, while implementing policies to tackle with the competition, always through fair and legal means, condemning all forms of unfair competition.



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### 2.17 Child labor

The Company is opposed to child labor and does not support it in any way. The Company does not employ children or young people under 18 years of age.

## 3. IMPLEMENTATION OF THE COMMITMENTS OF THE CODE OF CONDUCT

The principles of the Company, as presented in the Code of Conduct “**THREE SHIELDS**”, bind the Shareholders, the Board of Directors, the Employees (full-time or part-time, of fixed or indefinite contract), as well as their other external associates and/or their associates.

The Company constantly invests in sophisticated and innovative operating systems, but also in the development and advancement of the skills of its employees. The effort for the continuous improvement and development of the Company in the logistics market may bring changes in business practices, but the Company’s coherence with the values of honesty, transparency and integrity has always been its primary goal, thus achieving a fair balance between respect for society as a whole, and its own interests.



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