

Code of Ethics and Conduct [more.com](https://www.more.com)

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MORE.COM

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A. Introduction

More.com's (hereinafter the "Company") Code of Conduct and Ethics, as well as its overall corporate values and compliance culture require all employees to conduct themselves with the highest standards of integrity and in accordance with applicable laws and regulations. The present Policy is an important component of More.com's internal policies and processes and has been designed based on the business activity of the Company, the relevant regulatory framework and professional behavior standards.

Any reference to staff or personnel is perceived as reference to employees, BoD members, members of Senior Management, connected agents or other individuals that are directly or indirectly connected to the Company or they act on behalf of the Company (including in the context of outsourcing agreements), joint ventures, and its customers, as well as to any appointed representatives who shall be made aware of the present Code either upon entering into a relevant cooperation agreement with the Company or via electronic means or any other appropriate manner (henceforth also referred to as 'relevant persons').

The present Code applies to all staff members without exceptions. Each one of them is personally accountable for protecting the Company, its reputation and themselves from the risks that arise in case of deviation from the principles as mentioned below. The provisions and principles provided herein are subject to any stricter local laws or regulations which may apply in the countries where the Company is active in.

B. Objective of the Code & Scope of Application

All relevant persons to More.com are expected to behave with integrity and in a way that complies with their legal and regulatory obligations so as to build trust, credibility, reliability and safeguard the good reputation of the Company.

By the present Code, the Company aims to set out in one single text the key rules and principles considered necessary to ensure the required professional behavior by all relevant persons in the countries where the Company operates.

All relevant persons to the Company and especially members of staff and management are required to read the present Code and to comply with its provisions. In that regard, all relevant persons are advised that the provisions and guidelines set out herein are to be respected from the moment a person's relationship start with More.com. This Code, as it applies, is at all times available to members of the Company's staff and management and is communicated to all other relevant persons at the start of their relationship with the Company.

The present Code defines and describes the way we behave, implement our work and take decisions as employees of More.com. The present Code is consistent with our corporate values and no relevant person to the Company shall be exempted from the above commitment on grounds of omission and/or denial of reading the Code. Whenever necessary, the basic principles of the present Code of Ethics and Conduct are specified in further detail in policies and procedures of the Company.

C. Report a Potential Violation or Other Concern

Every relevant person to the Company has the right and the obligation to report actual and

potential violations of the present Code, the Company's Policies, as well as any applicable laws and in the countries the Company is active in. There are several ways to report a potential or actual violation or raise a concern. Reporting can be done anonymously, in accordance with the Company's Whistleblowing Policy. More.com prohibits intimidation or retaliation against anyone who shares a potential or actual violation of our Code of Conduct, in good faith, or assists with an investigation or inquiry. You can report concerns in the following way:

- Via email to the Company Compliance Function in the following address:
whistleblowing@more.com

D. Basic Principles for Ethical and Professional Conduct

1. Compliance with applicable legislation

The Company is active in various markets and complies with the applicable legislation having received all licenses required by law. The staff of the Company, in the context of the Company's business activities and within the framework of their duties, must comply with all applicable laws and regulations. Whenever in doubt as to whether an action or event is legal or in compliance with the relevant regulatory framework, staff members are strongly encouraged to raise their relevant concerns with their manager and reach out to the HR Department for further guidance.

2. More.com Corporate Governance and Compliance Culture

The Company complies with the regulatory and legal framework of good and responsible Corporate Governance. The applied Corporate Governance policies and procedures of More.com focus on the effective governance of all subgroups of the Company, with transparency and commitment to the provision of high- quality services.

The present Code is complementary to other Company Policies including without being limited to the following:

- Whistleblowing Policy and Process,
- Company policies on Conflict of Interests and Related Parties Transactions, Company Anti-Bribery and Anti-Corruption Policy,
- Employee Handbook and Equality, Diversity and Anti-Harassment Policy,
- Company Policies on personal data protection and confidentiality, including the Global Data Protection Governance Model,
- Company Policies and processes on anti-Money Laundering and prevention of financial crime,
- Company Outsourcing Policy,
- Company policies and processes on Information Security.

3. Obligation of Loyalty and Duty of Confidentiality

Each staff member has the obligation to perform their duties diligently and by omitting any action that may damage the assets, interests and reputation of the Company or the customers.

All persons relevant to the Company have the obligation to maintain strict confidentiality and not disclose any confidential information regarding the operations of the Company, including without being limited to financial information, technical data, agreements, personal data of employees, business strategies, information on the Company's intellectual property or patents, business plans for new products, strategic goals, customers' and suppliers' lists etc.

Confidential information should never be disclosed to anyone inside or outside the Company except as permitted by law, in the proper conduct of business, where disclosure is required by legal process, or where the Legal Department otherwise determines it is appropriate. The loss or unauthorized disclosure of confidential information may harm the Company and its clients and can result in termination. Any working space outside business premises, which has been approved by the Company management, is considered an extension of the workplace. Relevant persons should exercise the same degree of care in protecting confidential information away from the office as when working in the office.

This obligation of confidentiality applies even after the termination of the employment relationship – for any reason whatsoever – or the termination of the relevant person’s relationship with the Company, without any time limitation, in accordance with the terms of confidentiality that are included in detail within the relevant person’s employment or other contract with the Company.

4. Appropriate use and protection of More.com’s assets

The fixed assets of the Company and its office equipment that includes the buildings, the facilities, the furniture and hardware of the desks, the tools provided by the Company to the staff, either in tangible or intangible form, as per example the personal computers, the mobile phones, all office desk machinery that are provided to staff in order to perform their duties are assets of More.com.

The staff has the obligation to protect and make proper use of them, within the context of executing their professional duties, complying with any applicable legal rules and relevant guidance from Company management.

Company staff members must not remove any document, electronic record and material from the Company’s premises or systems without the latter’s consent, nor install or use software that has not been pre-installed or approved by the Company. For this purpose, the Company has a dedicated approval process regarding the installation of new software.

The safety rules of information and systems, as they are set out in detail within the Employee Handbook of the Company, are compulsory and binding for all staff.

5. Safe Internet Browsing & responsible communication

Company personnel must use the internet for professional matters or matters associated with the exercise of their professional duties without jeopardizing the security of the Company’s systems. All staff members, as well as members of management, must always comply with the Company’s Information Security policies and processes.

The use of electronic mail should be subject to the same rules of professional communication that apply to the written correspondence, in and out of the Company. All correspondence via electronic mail, which should primarily take place in order to serve the business goals of the Company, shall remain its property.

The Company is committed to making sure communications about the Company’s activities and its business is accurate and made by employees who are authorized to speak on the Company’s behalf. All relevant persons are expected to be alert to situations where they may be perceived as representing or speaking on behalf of More.com Remember to seek preclearance before speaking about More.com’s business or your role and responsibilities within the Company, in any public forum

or publication. The process to procure said permission is set out in the HR Presentation “Conflict of Interest” section.

The Company respects relevant persons’ right to engage in social, professional, and political dialogue outside of work. You must use good judgment when making personal statements in public, including on your personal social media accounts. Also use care in internal communications and be responsible with your comments on Teams postings.

6. Staff Transactions

Any provision of special favorable terms to the staff regarding certain types of transactions and accounts, must not be exercised abusively (e.g. such special terms and accounts must not be used in favor of third parties that have no relevant rights). The interests, as well as the transactions of the customer, are of prior importance to these of the staff. Each employee must abstain from transactions that create conflict with the interest of the customer, the Company or any other stakeholder and disclose to the Company Compliance Function any transactions that cause or may cause any conflict of interest.

7. Prevention of Money Laundering

All Company staff must be aware of the basic provisions of law regarding the Prevention and Suppression of Money Laundering, as well as of the guidelines of the pertinent authorities and the procedures of the Company.

8. Company Policy on Anti-Bribery and Anti-Corruption

The Company has a zero tolerance to any behavior which may constitute actual or suspected Bribery or be considered to incite Corruption. Consequently, the prevention, detection and reporting of Bribery and Corruption, is the responsibility of all Company employees, directors, senior managers and all other associates, providers and third parties who perform services for or on behalf of the Company. Staff members are prohibited from giving and receiving gifts/meals and hospitality to/from customers or potential associates of the Company.

Gifts of low value that are given in the course of usual business ethics and social decency and that do not jeopardize the moral integrity of the recipient or promotional presents of low value (marketing material), such as office supplies bearing the Company logo are permitted. In this context, if the value or suspected value of a gift exceeds the threshold of 50 euro, the gift is not considered as ‘low value’ and this exemption does not apply.

The Company encourages a speak-up culture regarding any behavior and provides to all stakeholders an open, secure and confidential channel to report any such behaviors or suspected actions.

9. Theft, Fraud, Forgery

Any theft, abuse, fraud, forgery and appropriation of money, securities, or other assets of the Company as well as the use – even temporarily – of company’s assets for personal benefit, without the explicit consent of the Management, is forbidden.

10. Behavior in the workplace

Each member of the staff is obliged to strictly follow the internal regulations and/or procedures that are issued from time to time by the Company and are included in its Employee Handbook. The respect to colleagues, as well as the development and abetting of cooperation and team spirit are

promoted. Also, the use of illegal substances or the consuming of alcohol is not allowed during working time.

11. Innovation and creativity

The employees are required to take innovative initiatives and to suggest new ideas and solutions, as well as to have the proper technical knowledge and skills that are necessary for their role and to remain up to date on the new developments of their field.

12. Behavior to customers and third-parties in general

The Company is committed to providing high quality services that effectively meet the needs of its customers. The staff must behave with responsibility, honesty and kindness to the customers, to achieve a high standard of service and equal treatment for all customers and to try to find solutions in any problems and complaints that may arise. The Company implements policies and processes that ensure effective customer support and fair treatment of vulnerable customers. An appropriate level of care is provided in all cases.

The staff's behavior, in and out of the working place, to any third party (e.g. customers, suppliers etc.), must be such that cooperation and the interests of the Company are promoted.

13. Dress code and appearance

In accordance with the Employee Handbook, all staff members must ensure that their dress code and their appearance in general is professional and appropriate for their duties.

14. Prohibition of discrimination and harassment

Any kind of discrimination within the working place, regarding the procedure of hiring, the remuneration or the training, evolution and promotion or termination of the employment relationship based on racial or national origin of employees or on other characteristics such as, indicatively, sex, age or sexual orientation of employees, political or religious beliefs, is prohibited. In any case, the respect to each person's individuality, as this is defined, is required.

Moreover, any harassment or the sexual harassment in the working place, for example physical contact (from touching and even to attack), joking, gossiping and use of offensive language, are prohibited.

ALL employees of More.com have a responsibility for ensuring that they adhere to the Equality, & Diversity & Anti-Harassment Policy of the company and apply its principles in their day-to-day dealings with fellow employees, applicants, clients, contractors and any other relevant stakeholders. If a staff member faces a problem of unequal treatment or harassment by a colleague in the working place and if, after a notice that such behavior is forbidden and unacceptable this colleague insists on it, then a formal complaint may be made to the direct manager of the staff member who faces the problem of harassment or to the HR Manager. The Company's Whistleblowing email is also available for the submission of relevant reports. The handling of such complaints shall be discreet and confidential.

15. Personal data of employees and third parties- Confidentiality

The Company is committed to respecting the privacy of individuals, including employees and customers. Employees who, during their employment relationship, have access to personal data of other employees or third parties are obliged to keep this information confidential in a way that is compliant with the legislation on protection of personal data. Employees must be aware of the

seriousness of any violation and the sanctions provisioned in the applicable legislation in case of non-keeping such data as confidential and disclosing them to any third party, apart from the persons to which is required and to the extent required for the performance of their duties in the Company. All staff should carefully read the Global Data Protection Governance Model and adhere to the principles outlined in the policy in their relationships with fellow employees and/or third parties.

16. Avoidance of Conflicts of Interest

The Company has an obligation to act in the customers' best interest. For this reason, the Company applies a Conflicts of Interest Policy providing the necessary guidance for the Board of Directors, managing executives and employees on what conflicts of interests are, how they can be identified and what procedures should be followed in such cases.

The staff must avoid any actions that may lead to conflict between their interests and the Company's interest. Each staff member that is in doubt regarding any action or believes that its personal interests are or may conflict with those of the Company, should notify the Company Compliance Function and follow the Company Conflict of Interest Policy that forms an integral part of the Code.

17. External employment

As provided in the Company's Conflict of Interests Policy, the employment relationship between the staff and the Company is for full time employment and exclusive.

Parallel employment of Company personnel is not allowed. Any other form of employment of the employees in the private or public sector or in business firms that exercise, directly or indirectly, competitive activities to those of the Company, regardless of paid or not, should be notified to the HR Function and special permission should be sought. The same also applies in the case where a competitive activity is not exercised, however, the parallel employment of the employee would probably reduce their performance when working for the Company.

18. Assignment of rights in intangible assets

Any creation of intellectual or industrial property, as, indicatively, project, software applications, invention, discovery, improvement, method, creative material etc. that may be implemented by staff members throughout their employment relationship with the Company, in person or jointly with others during working time or out of work on behalf of Company, belongs to the latter, to which the employee hereinafter assigns every right on the above creations, and on which the Company, in any case, reserves its rights.

19. Anonymous reporting- Company Whistleblowing Policy

If any staff member becomes aware of any form of violation or irregularity or infringement of the provisions of this Code or any immoral or suspicious or illegal practice by a colleague (including those that are hierarchically superior, e.g. head), then the staff member that identified the violation is obliged to report it, depending on the nature and the severity of the violation to the Company Compliance Function.

The Company maintains a Whistleblowing email for the secure receipt of written reports on breaches and any related information. Reporting persons are protected from retaliation in accordance with the applicable framework. The Company Whistleblowing Policy ensures the appropriate safeguards are in place to protect all reporting persons acting in good faith from any form of retaliation, including threats or attempts thereof.

20. Commitment to sound competition in all countries of operations

When two or more competing businesses agree to act together instead of competing as they normally do, this is known as collusion and these groups, are commonly referred to as cartels. More.com's values and business culture consider that free and competitive markets are crucial for innovation and effective business growth and, therefore More.com is committed to avoiding all kinds of anti-competitive behavior.

If, in the context of your duties, you are perceived to act on behalf of More.com in any capacity whatsoever or you do in fact operate as More.com's representative (e.g. in national or European business associations or in in any organizations, associations, fora, seminars, conventions or meetings, either formal or informal) you must not participate in and promptly exit any discussions on:

- Price fixing, which occurs when competitors agree on pricing rather than competing against each other
- Market sharing, which occurs when competitors agree to divide or allocate customers, suppliers or geographic areas among themselves rather than making independent decisions
- Bid rigging, which occurs when competitors, secretly agree to raise prices or lower the quality of goods or services for purchasers who wish to acquire products or services through a bidding process.

D. Application of the Code

The compliance with and application of all principles of the Code concerns all Company staff, depending on its duties and responsibilities. Each employee must read them well and abide by them. All Company employees regardless of their hierarchical level, as well as other Relevant Persons, are responsible for reporting any conflict of interest to the Legal Function. In doing so, they may also approach their line manager and the HR Department.

Communications with the Company Compliance Function in the context of the present Policy may take place via email to the following address: whistleblowing@more.com

The Company Compliance Function shall assess each case and take appropriate measures to manage and mitigate the risk and, if necessary, escalate the issue in accordance with the Company policies, as the case may be (e.g. Conflicts of Interest Policy, Anti-Bribery and Corruption Policy e.t.c.). Confidentiality is maintained in all cases, in accordance with the applicable legal and regulatory framework.

Whoever violates the Code is subject to sanctions that, depending on the severity of the violation and the risk caused by such violation, may include disciplinary actions, termination of the employment relationship with the Company for cause, claim for positive damages or loss or even criminal prosecution in accordance with the applicable laws, as in force from time to time. Staff who raise or report concerns in good faith, are being protected from retaliation in accordance with Company's Whistleblowing Policy.

All Company staff are required to read and understand the present Code, as well as the Company's other policies and processes.