

THELMA FRESH sets as its goal and is committed to:

To comply with applicable national and Community legislation to implement the requirements of the Sedex (Smeta) standard to reduce the impact of its Ethical Commercial Practices and to continuously improve the performance of its Ethical Commercial Practices.

- Its activities, products and services support a healthy and safe work environment.
- Unemployment commitment for people under 18, pregnant women in advanced pregnancy or people with health problems.
- Commitment to comply with applicable legal requirements and other requirements that the company has signed, which are related to its ethical aspects.
- Investing in a cost-effective way in the best available technologies and practices, in order to ensure a healthy and safe working environment and employee satisfaction.
- Promote a culture of integrity and create a work environment in which employees feel comfortable raising issues and concerns without fear of retaliation.
- Responding to employees' ethical concerns in a professional and timely manner.
- Build a culture of integrity and compliance through their recruitment and promotion decisions based on ethical character and behavior. Promotions are a privilege that extends only to those who exemplify THELMA FRESH's attitudes and values in a way that is consistent with this handbook.
- Investing in an economically viable way in the best available technologies and practices, in order to save energy and natural resources and reduce to a minimum the production of waste and emissions.
- Recycling internally and / or has for recycling all recyclable by-products, waste and residues of its activities.
- The immediate examination of any non-compliance, accident and complaint concerning the working environment in order to identify its causes and take appropriate corrective and preventive measures to avoid its recurrence.
- The preparation of emergency action plans for dealing with accidents.
- Training / education motivating its executives to carry out their duties responsibly.
- Encouraging all its partners in terms of environmental protection.

To achieve the above, the company implements a System of Ethical Commercial Practices, in accordance with the requirements of the Sedex standard (Smeta), and is committed to this for its continuous improvement in the performance of Ethical Commercial Practices. The ethical business practice policy has been communicated to all company staff and immediate associates and has been posted prominently in Thelma Fresh S.M.P.C. and in the production and standardization areas, while outside the company it is made public upon a relevant request.

Company Manager Thelma Fresh S.M.P.C.

Gountopoulos Grigoris



SEDEX (SMETA)		THELMA FRESH S.M.P.C.		1
ΕΚΔΟΣΗ	ΗΜΕΡΟΜΗΝΙΑ ΕΚΔΟΣΗΣ	ΥΠΕΥΘΥΝΟΣ ΣΥΝΤΑΞΗΣ	ΥΠΕΥΘΥΝΟΣ ΕΓΚΡΙΣΗΣ	
01	12.06.2020	AGRONOMIA	ΓΡΗΓΟΡΗΣ ΓΚΟΥΝΤΟΠΟΥΛΟΣ	

Dear partners,

The rapidly changing business environment we operate requires our timely response to preserve a corporate culture based on strong and consistent values and leads us to the immediate adoption of change and innovative ideas.

We operate responsibly, transparently, with meritocracy, in a high-performance environment, with appropriate standards of behavior and cooperation.

We reform the Code of Ethics & Ethics in order for our behaviors and actions to create added value, to be governed by integrity and trust, to challenge the data and to excite the customer and the society.

I urge everyone and everyone individually to implement the new Code with a high sense of commitment. Together we have the responsibility to ensure the reputation and future of Thelma Fresh, by adopting standards of professional excellence and integrity.

Being deeply aware of our responsibility, we are committed to the practical application of the principles of the Code in every area of our business activity.

The Code of Ethics & Ethics strengthens our values in practice.

THE PURPOSE

Its mission is to promote the packaging and sale of high quality pomegranates by providing a friendly and safe working environment.

THE VALUES

We make sure our values meet the needs of all stakeholders.

We are constantly creating value, we see data as a challenge.

CUSTOMERS

We approach our customers responsibly, we care about their needs, we exceed their expectations and simple procedures. We adopt technological solutions for the best customer experience, we open new roads and conquer them.

EMPLOYEES

Our people, with a high sense of responsibility, enjoy a modern and meritocratic work environment.

We encourage open communication and the expression of different views. We discover new opportunities, fruitfully challenging the data, in a responsible and productive way.

ECONOMY

Each of our activities looks forward to optimal financial performance, long-term returns, efficiency and transparency.

SOCIETY

Our responsible role creates value and positively affects the Greek market and development, while at the same time strengthening the viability of the Greek economy.

We envision and take initiatives, challenge the established and create opportunities for the development of the rural economy.

The main points of our work framework

WE COMMIT TO...

We inform the competent bodies about any negligence and / or illegal, dishonest act and / or irregularity that comes to our notice, even if it concerns procedures and data. We approach our work and provide our services according to the current schedule. We work, during our hours, exclusively with tasks related to our responsibilities. We inform about our absence outside the workplace during our hours. We maintain a healthy working environment free from tobacco products, electronic cigarettes, alcohol and substances. We take care to maintain hygiene and cleanliness in workplaces and public areas. We respect our colleagues when we work. We consistently and diligently manage the products that will come into our possession or management in our capacity as employees. We inform our employer of any change in our marital status, any change of home address, as well as of any event, incident or situation that could affect our employment relationship with the company, or that could be a legal basis for any our right to the company. We inform our employer about anything that falls into our perception other than the normal operation of the company.

WE COMMIT NOT TO

We participate in cases and actions that may be related to criminal activities, bribery or corruption. We manipulate and / or deceive others. We judge, comment, criticize, threaten, intimidate and / or harass our colleagues. We act for our own benefit, using the means, infrastructure, data, access and / or human resources of the company. We are absent arbitrarily. We are influenced by the ideological and political beliefs of our colleagues during the service crisis and / or for their development. We execute instructions contrary to the Policies, Procedures and Regulations of the company.

WE ARE DOING

We follow our Code and Policies, and have an obligation to report any irregularities we find.

A basic and inviolable principle is the protection of the anonymity and the principle of confidentiality of the data of the persons submitting such reports.

Thelma Fresh opposes retaliation against any employee who reports or participates in the investigation of any breach of the Code of Conduct & Ethics.

We remember that any timely complaint that is submitted in a timely manner protects both the company and all of us.

BRIEF POLICY AND PURPOSE

The "No Retaliation" company policy describes our provisions against employees who report harmful, discriminatory or immoral conduct. Whether the allegations are true or false, our company wants to prevent victimization and other retaliation against the employee. We believe that it is important for employees not to be afraid to talk about any issues. It is in the interest of our company to resolve them as soon as possible. An environment of fear can only be harmful in the long run.

We will follow all legal bans on retaliation and give employees the right to speak out. In any case, we will make an effort to maintain legitimacy and business ethics.

FIELD OF APPLICATION

This policy applies to all candidates, current or former employees of the company.

POLICY ELEMENTS

Actions that often provoke retaliation include, but are not limited to:

- Complaints of harassment or discrimination in the workplace
- Complaints about corporate actions that harm the environment or society
- Applications for parental or other leave
- Participation in a pending investigation of a misdemeanor or violation
- Lawsuits for unlawful dismissal or termination of cause

Employees can file complaints internally. Or they can talk to people who are able to sue the alleged culprit. These workers are called "Whistleblowers".

In any case, we will follow our principles in the workplace without harassment. Employees who report misconduct or suspected misconduct should be protected from retaliation. We do not want to silence complaints, but we encourage open communication in accordance with our open door policy.

Why do we need a non-retaliatory policy?

We need a non-retaliatory policy for two reasons. First, when the reports have a solid basis, we need to look at them and take action. Retaliation against an employee who has paid attention to inconsistencies or breaches will damage the credibility and credibility of our company. Second, any kind of retaliation, intentional or unintentional, can put us in serious legal danger.

It is important to note that this policy refers to circumstances where an employee's report is true, as well as to cases where the report is unfounded. We do not consider the report valid when there are no retaliation principles as required by law.

Our company will wrongly punish its employees in any way and for any reason.

Retaliation in the workplace can be expressed in a variety of ways. These include, but are not limited to:

- Deception
- Termination or illegal withdrawal of benefits
- Reduction of compensation
- Poor evaluation of job performance
- Exclusion from corporate events or meetings
- Defamation of character (prominent in cases of former employees)

Retaliation is generally defined as any kind of negative action against a current or former employee that takes the form of punishment and creates a hostile, threatening or uncomfortable environment as a result of their denunciation.

Employees found guilty of retaliation will be subject to disciplinary action which may also lead to termination.

Disciplinary action may also be taken against employees who have repeatedly made false or unreasonable allegations against us and have been shown to have deliberately lied, falsified evidence, acted maliciously or for personal gain. In this way we can ensure that employees do not benefit from our policy and always act in good faith.

ACTIONS

Employees have the right to report problems, suggestions or issues to any manager. No retaliation policy applies to all official or unofficial reports. All complaints will remain confidential and the investigation will be as inconvenient as possible.

In cases of lawsuits or complaints filed with an authority or legal entity, employees will not be the victims of retaliation. If an employee complains to our company about another employee, we will take it seriously and investigate it thoroughly. If we have to act immediately during our investigation (as in cases of harassment), we will ensure that the employee who lodged the complaint will not be affected in any way. The alleged offender may see his employment or position affected until the investigation is completed.

In some cases, a reporting employee may face disciplinary action for an unrelated offense. We will provide official documentation stating the reason for the disciplinary proceedings against the employee, along with evidence of the misconduct.

BRIEF POLICY AND PURPOSE

Corporate Social Responsibility (CSR) refers to our responsibility to our environment. The existence of our company is not alone. It is part of a larger system of people, values, other organisms and nature. The social responsibility of a business is to return to the world as it gives us.

What is corporate social responsibility?

Corporate Social Responsibility policy describes our efforts to give back to the world as it gives us.

FIELD OF APPLICATION

This policy applies to our company. It can also refer to suppliers and partners.

POLICY ELEMENTS

We want to be a responsible company that meets the highest standards of ethics and professionalism.

The social responsibility of our company falls into two categories: compliance and precaution. Compliance refers to our company's commitment to legality and willingness to uphold Community values. Foresight is any initiative to promote human rights, help communities and protect our natural environment.

COMPLIANCE

Legality

In our company:

Respect the law

Honor its internal policies

Make sure all her business activities are legal

Keep all cooperation and collaboration open and transparent

Business ethics

We will always conduct business with integrity and respect for human rights.

We will promote:

Security and fair transactions

Respect for the consumer

Anti-corruption and anti-corruption practices

Examples of Corporate Social Responsibility

Protecting the environment

Our company recognizes the need to protect the natural environment. Keeping our environment clean and undefiled is a benefit for everyone. We will always follow best practices when disposing of waste and using chemicals. Management will also play an important role.

Protection of people

We will ensure that:

Do not endanger the health and safety of our employees and our community.

Avoid harming the lives of locals and indigenous people.

Supporting diversity and inclusion.

Human Rights

Our company is committed to the protection of human rights. We are committed employers of equal opportunities and will adhere to all fair work practices. We will ensure that our activities do not directly or indirectly violate human rights in any country (eg forced labor).

PREVENTIVENESS**Preservation of the environment**

In addition to legal obligations, our company will protect the environment as a precaution. Examples of related activities include:

Recycling

Energy saving

Use of environmentally friendly technologies

Community support

BRIEF POLICY AND PURPOSE

Build trust and reliability

The success of our business depends on the trust we gain from our employees, our customers. We gain credibility by staying true to our commitments, demonstrating honesty and integrity, and achieving corporate goals solely through honest behavior. It is easy to say what we should do, but the proof is in our actions.

When considering any action, it is wise to ask: will this build trust and confidence? Will it help create a work environment that can be successful in the long run? Is the commitment I make the same as the one I can follow? The only way to maximize trust and credibility is to answer "yes" to these questions and work daily to build our trust and credibility.

Respect for the individual

We all deserve to work in an environment where we are treated with dignity and respect. Thelma Fresh is committed to creating such an environment, because it highlights the full potential of each of us, which, in turn, directly contributes to our business success.

Thelma Fresh is an employer of equal employment / affirmative action and is committed to providing a workplace free of discrimination of all kinds from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to the manager.

Create a culture of open and honest communication

At Thelma Fresh everyone should feel comfortable talking, especially when it comes to ethics. The manager has a responsibility to create an open and supportive environment where employees feel comfortable asking such questions. We all benefit greatly when employees use their power to prevent mistakes or wrongdoing by asking the right questions at the right time.

Thelma Fresh will investigate all reported cases of questionable or immoral conduct. In any case where inappropriate behavior was found, the company will take appropriate action. We will not tolerate retaliation against employees who express good faith concerns about real ethics.

For your information, Thelma Fresh's complaint policy is as follows:

Employees are encouraged, first, to deal with such issues with the manager, as most problems can be resolved quickly. If for any reason that is not possible or if an employee does not feel comfortable raising the issue with the manager Grigoris Gountopoulos the company Thelma Fresh operates with an open door policy.

Management has the additional responsibility to demonstrate, through their actions, the importance of this Code. In any business, ethical behavior does not just happen. It is the product of clear and direct communication of behavioral expectations, shaped by the top and demonstrated by example. Again, finally, our actions are what matter.

For our Code to work, the administrator must be responsible for dealing promptly with ethical issues or concerns raised by employees and for taking appropriate action to address such issues. It should not view employees' ethical concerns as threats or challenges to their power, but as another encouraging form of business communication. At Thelma Fresh we want ethical dialogue to become a natural part of our daily work.

Commitment to integrity begins with compliance with the laws, rules and regulations in which we operate. In addition, each of us must have an understanding of the corporate policies, laws, rules and regulations that apply to our specific roles. If we are unsure whether a statutory or policy action is permitted we should seek the advice of a resource expert. We are responsible for preventing violations of the law and to speak out if we observe possible violations.

competition

We are committed to ethical, fair and intense competition. We will sell Thelma Fresh products and services based on their value, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not cooperate or mis-coordinate our activities with our competitors. We will not offer or solicit inappropriate payments or gratuities in connection with the purchase of goods or services or the sale of its products or services, nor will we engage in or assist in the illegal boycott of specific customers.

Property information

It is important to respect the property rights of others. We will not acquire or seek to obtain inappropriate means of trade secrets of a competitor or other proprietary or confidential information. We will not undertake unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective revelation

We will not selectively disclose (either in one or in small discussions, meetings, presentations, proposals or otherwise) any material non-public information about its securities, business activities, plans, financial position, operations or any development plan. We need to be very careful when making presentations or suggestions to our clients to ensure that our presentations do not contain important non-public information.

HEALTH AND SAFETY

Thelma Fresh is dedicated to maintaining a healthy environment. A safety manual is designed to educate you about workplace safety. Avoid conflicts of interest.

Conflicts of interest

We must avoid any relationship or activity that may harm, or even seem to affect, our ability to make objective and fair decisions in the performance of our duties. Sometimes, we may be faced with situations where the business we undertake on behalf of the company may conflict with our personal or family interests. We must promote his legitimate interests when the opportunity arises to do so. We must never use property or information for personal gain or personally for any opportunity discovered through our location.

Thelma Fresh is committed to competing exclusively with the value of our products and services. We must refrain from any actions that create the impression that Thelma Fresh has requested, received or given favorable treatment to external entities in exchange for personal business nobility. Business courtesies include gifts, tips, meals, refreshments, entertainment or other benefits from individuals or companies with which the company is or may be doing business. We will not give or accept polite business contracts that constitute, or could reasonably be construed as, unlawful business incitements that violate the law, regulations or policies or of customers, or cause embarrassment or negatively affect Thelma Fresh's reputation.

Employees who award contracts or can influence the distribution of companies, who create standards that lead to the placement of companies or who participate in the negotiation of contracts must be especially careful to avoid actions that create favoritism or that may adversely affect the company reputation for impartiality and fair conduct.

CORPORATE RECORDS

We create, maintain and dispose of our company records as part of our normal business process in accordance with all policies and guidelines as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and corporate records must be entered promptly and accurately in our books in accordance with applicable accounting principles.

We must not mislead, manipulate or mislead any unauthorized auditors, nor interfere with any auditors who have undertaken an independent internal audit of books, records, procedures or internal audits.

RESPONSIBILITY

Each of us is responsible for knowing and adhering to values and standards and for asking questions if we are unsure of company policy. If we are concerned that the standards are met or we know of any violations, we should contact the administrator.

Thelma Fresh takes standards seriously and breaches cause disciplinary action until termination.

CONFIDENTIAL AND OWNERSHIP INFORMATION

Integral to its business success is our protection of company confidential information, as well as non-public information trusted by employees, customers and other business partners. Confidential and proprietary information includes things like prices and financial data, customer names / addresses or non-public information about other companies, including current or potential suppliers and sellers. We will not disclose confidential or non-public information without a valid business purpose and proper authorization.

USE OF CORPORATE RESOURCES

Corporate resources, including time, material, equipment and information, are provided for the business use of the company. However, occasional personal use is permitted as long as it does not affect work performance or cause disruption in the workplace.

The employees and those who represent Thelma Fresh trust to behave responsibly and use the right judgment to conserve the company's resources.

FIELD OF APPLICATION

This Human Rights Policy applies to all Thelma Fresh employees. Everyone is expected to comply with this policy and carry out their activities on behalf of Thelma Fresh accordingly. Thelma Fresh is also committed to working with consortia, suppliers and other third parties that adhere to the principles of this Policy or adopt similar policies in their businesses. To this end, suppliers and other third parties are required to accept Thelma Fresh's Supplier Policy, which is in line with the expectations and commitments of this Human Rights Policy.

Respect for human rights is fundamental to Thelma Fresh, as well as to the communities in which we operate. At Thelma Fresh we are committed to ensuring that people are treated fairly with dignity and respect, and we are also committed to working with stakeholders in our local communities - including those of indigenous or other endangered populations - to ensure that we and we take into account their views, as well as that we respect the respective cultures, heritage and traditional rights in the conduct of our business.

Thelma Fresh's Human Rights Policy is based on the international human rights principles enshrined in the Universal Declaration of Fundamental Rights and the International Labor Organization and the United Nations Human Rights. As proof of our commitment to these principles, Thelma Fresh supports the UNGC Ten Principles in the areas of human rights, labor, environment and the fight against corruption.

We value diversity

Thelma Fresh appreciates the diversity of the people we work with and their contribution. We have been committed to equal opportunities for many years and we do not tolerate any discrimination or harassment. We are committed to maintaining workplaces that do not discriminate on the basis of race, sex, color, nationality or ethnicity, class, religion, age, disability, marital status, sexual orientation or gender, political beliefs or any other form of belief. protected by applicable law.

In every field and culture, Thelma Fresh aims to be the employer of choice. We seek, hire, place, train, remunerate and promote the best executives for the job based on their value and skills in relation to the job - without discrimination.

HUMAN RIGHTS POLICY

Regardless of personal characteristics or status, Thelma Fresh does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind in the workplace and in any case related to work, but it happens outside the workplace.

Forced labor and human trafficking

Thelma Fresh prohibits - both in its activities and in the activities of its suppliers - the use of all forms of forced labor, including work in prison, labor in particularly burdensome contracts, slave labor, military labor and slavery, as well as all forms of trafficking in human beings.

Thelma Fresh acknowledges that one of the most vulnerable groups may be migrant workers who have traveled within the country or abroad to find work.

In order to provide the best protection for this category of workers, Thelma Fresh ensures that: (1) migrant workers have exactly the same rights as local workers, (2) any commissions or other employment-related remuneration migrant workers must be covered by the company, not migrant workers, and (3) migrant workers are not required to submit their identity documents, except for the short period of time required to verify identity and suitability for work.

Child labour

Thelma Fresh will not tolerate child labor in both its activities and the activities of its suppliers. We believe that any kind of work is harmful, abusive or destructive if started at a very young age. Therefore, we do not employ children - and we do not work with suppliers or other third parties who employ children - under the age of 15 or below the minimum age limit for employment, whatever age is older. In addition, we will not employ anyone under the age of 18 if they may engage in work that could be classified as hazardous and we will not tolerate suppliers or third parties doing so.

Indigenous populations

We respect the rights of indigenous peoples where they are affected by our business activities.

Working hours, wages and benefits

Thelma Fresh recognizes that pay is an important factor in achieving a satisfactory standard of living. We operate in full compliance with all applicable laws on pay, working hours, overtime and benefits.

HUMAN RIGHTS POLICY

Thelma Fresh only works with suppliers and other third parties that comply with applicable pay, working hours, overtime and benefits laws.

Safe and healthy workplace

Thelma Fresh makes every effort to provide all its employees with a safe and healthy workplace and complies with all applicable safety and health laws, regulations and internal requirements.

In addition, Thelma Fresh is committed to maintaining a workplace free of violence, bullying and other unsafe or annoying conditions due to internal or external threats. Employee safety measures are provided as needed and will be maintained with respect for the privacy and dignity of employees.

Freedom of association and collective bargaining

Thelma Fresh respects the right of employees to join, form or not join unions, without fear of retaliation, revenge, intimidation or harassment. When employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with freely chosen representatives. Thelma Fresh is committed to negotiating good faith with these representatives.

Thelma Fresh creates workplaces where open and honest communication between all employees is valued and valued. According to Thelma Fresh Policy, there will be no retaliation or retaliation against any employee for expressing concerns under this Human Rights Policy. Thelma Fresh undertakes to investigate, deal with and respond to employee concerns and to take appropriate corrective action in the event of any breach.

GENERAL PART

PURPOSE

The labor regulation aims to formulate and maintain clear and smooth working relations between the company THELMA FRESH S.M.P.C. and its staff.

EXCELLENCE OF LABOR LEGISLATION

1. All the provisions of the labor legislation as they apply each time are applied to the personnel of the company and are supplemented by the Labor Regulations which have a contractual force.
2. Complement to the Rules of Procedure are procedures and general or special instructions which will be announced in writing and will apply to all staff or part of it, within the framework of the managerial right of the company.

PERSONAL FIELD OF APPLICATION

The labor regulation covers those who are hired by the company with any form of dependent employment relationship and are employed in any unit (offices, production units, shops, warehouses, etc.) and in any place. Likewise, those who are employed in a dependent employment relationship of any kind in companies or units that enter the Company in any legal way, including the merger, unless otherwise agreed.

RECRUITMENTS AND MEMBERSHIP

1. The process of recruitment and integration of staff in a specific unit is determined and modified by decisions of the articles of association or authorized bodies of the company always within the framework of the current legislation. The methods, tests, interviews and other means of selection are always guided by respect for the candidate's personality and the interest of the company.
2. Recruitment is done only by an authorized representative or executive of the company. The employee draws up an employment contract with the company, written in the format chosen by the company. After signing the contract, the employee becomes aware of this regulation and signs a relevant statement.
3. The gender or marital status of the candidate is not considered a disadvantage for the recruitment.
4. A register is compiled for each employee, in which all service changes (previous service, transfers, penalties, etc.) are registered.
5. The recruitment is subject to the dissolution condition, that the recruiter will deliver to the competent service and within the specified deadline all the data and documents requested during the recruitment (licenses to practice profession, driving, use of machinery, etc.), or that has notified the company that he holds and on the basis of which the company has evaluated the candidate capable of meeting the responsibilities and requirements of the position for which he has been hired. Also that he will hand over to the manager of the company the necessary documents and medical examinations for the preparation of the certificates of suitability for work. In case of delay in submitting the necessary supporting documents, the employee's previous service begins to be calculated from their submission.
6. The change of any element that affects the relationship of each employee with the company such as the change of home address or telephone number, the change of conditions for which allowance is paid, etc. must be notified immediately to the responsible supervisor. Salary changes are made only by presenting the respective supporting documents without retroactive effect.

NOTIFICATION OF ANNOUNCEMENTS

Commands, internal rules and instructions of the company are communicated to the staff in the above manner. When posted on the workplace bulletin board, they are considered to have been read by all employees at the same place. When distributed to employees it is considered to have been read by them.

EDUCATION / POST-EDUCATION

1. Monitoring the developments and the constant information are of great importance for the ability of each employee to fulfill his official duties but also to maintain his active presence in the labor market. For this reason, the company has the right to invite employees individually or in groups with criteria, which it will determine, to participate in training of any form and level, including training and information on health and safety and for a period determined by the type and type of education. The employee has the right to refuse to participate in training only when there are serious family or personal reasons and after approval by the company.
2. Every employee has a basic contractual obligation to actively participate in the training for which he has been selected.
3. The employee's participation in training and retraining programs is evaluated. The evaluation is notified to the interested party.

RELATIONS BETWEEN COLLEAGUES

Particular importance is attached to maintaining good relations between colleagues. Respect, dignity, courtesy, camaraderie, willingness, characterize the company's staff, regardless of duties and position in the hierarchy and regardless of the presence of third parties. Much more in front of third parties have no place quarrels and quarrels.

PROFESSIONAL OBLIGATIONS

Every employee must apply the laws and all the provisions that regulate the object of his work. Likewise, he must comply with the technical specifications, the rules of operation and maintenance and the instructions that refer to the machines he operates and in general to the object of his work and to obey the specific hygiene and safety instructions applied by the company. Every employee is obliged to be at his / her place of work on time at the beginning of the working hours and to note the tab of the attendance schedule when arriving and leaving the work. Even in case of a short absence, he is obliged to note his departure and re-entry which will be accompanied by a written permission of the responsible person. Disobedience, impudence and indecent behavior towards the managers and the Management of the Company, as well as the unjustified refusal or failure to perform due work are considered misdemeanors.

FOOD - BEVERAGES - USE OF SUBSTANCES

Consumption of food or soft drinks is allowed only in the designated areas. The consumption or introduction into the workplace of any kind of alcoholic beverages or other addictive substances is prohibited. Employees are not allowed to drink alcohol or other addictive substances before hiring.

lucky games

Gambling is prohibited on the company's premises, regardless of whether the employees are on break or out of working hours.

PERSONAL ITEMS

Employees' personal belongings or packages will be stored in a separate work area. Upon leaving the company's premises, personal items (bags, bags, backpacks, etc.) are checked by the company's security at the exit of staff in a special area and with discretion.

MOBILE PHONES - TELEVISIONS - RECORDERS - RADIO

The use of non-corporate mobile phones is not allowed during working hours unless there is special approval. In case of emergency, every employee will be able to call the official telephone. The use of televisions, tape recorders, radios is also not allowed.

PROTECTION OF THINGS

1. Buildings, facilities, goods, machinery, tools and all things around us are the working environment. We respect them, we use them according to their purpose and only within the framework of our work duties, we observe the rules of their maintenance, we always keep them clean. We do not move them outside the company except upon official order.
2. We do not touch things of colleagues and third parties without their permission.
3. The company is not responsible for the loss of personal items in the workplace.

ACCESS TO FACILITIES

1. All employees must use the designated entry and exit points of staff, except in emergencies.
2. The access and use of the company's premises, especially where there are machines and special facilities and designated "danger zones" is dangerous for persons who are not trained and do not know how to use them. Thus, in order to prevent accidents and to achieve the maximum possible safety in the workplace, employees must move only in the areas provided for the performance of their duties or in the areas intended for use by all staff. Outside working hours, company employees must behave like guests and move only in areas provided for the public.

USE OF WASTE

1. The company has provided locker rooms for the convenience of employees. Personal wardrobes are provided in these areas. Employees are required to use these spaces responsibly, so that they are always clean and tidy. No personal or other items are allowed outside the wardrobe.
2. Locker rooms are not intended for rest or use during the employee's working hours. The places for rest are different.
3. It is forbidden for the staff to open and search the wardrobe of their colleagues.
4. The care and maintenance of the cleanliness of the sanitary facilities is the obligation of all.

DOCUMENT PROTECTION AND CIRCULATION

1. Documents whose purpose is to remain on the premises of the company are prohibited to be transferred outside the company as such or in any form of reproduction. They are not disclosed to third parties and only upon order. Unauthorized destruction of official documents, posted announcements and all kinds of official plates and their removal from the place where they have been posted is prohibited.
2. The distribution of newspapers, magazines, advertising leaflets of any kind within the premises of the company is prohibited unless there is the approval of the management.
3. It is forbidden to read personal documents, concerning other employees.
4. Distribution is exceptionally allowed by a member of Thelma Fresh S.M.P.C. of the union of information material workers of the trade union and for a period of not more than half an hour.

TIPS AND GIFTS

- It is forbidden to accept gifts and tips (in any space, form or value) from customers, suppliers or external partners.
2. Acceptance of personal challenges by associates or prospective associates of the company require prior approval.

RIGHT TO INFORMATION

1. Employees are entitled to be informed first by their boss and if necessary by the Manager for all their rights and obligations arising from labor law, Rules of Procedure and the individual employment contract.
2. Every employee has the right to ask for clarifications on any issue that concerns their rights and the object of his work and the person in charge of informing them must give the necessary explanations.

HOLIDAYS

The days of obligatory holiday are a) March 25, b) Easter Monday, c) the feast of the Assumption of the Virgin and d) the feast of the Nativity of Christ, as provided by law. The days of optional holiday are: a) the 1st of May and b) the 28th of October, as the law stipulates.

NORMAL LICENSE

1. The annual regular leave is granted, as defined by the current labor legislation, after taking into account the operational needs of the company when planning the licenses.
2. The company reserves the right to grant this leave, at its discretion to so many employees and at such a time that its smooth operation is not hindered and with the basic condition that the relevant provisions of the labor legislation will not be violated.
3. Part-time employees are entitled to annual leave, the remuneration of which, as well as the leave allowance, is formed on the basis of the reduced remuneration due to part-time employment.
4. It is mandatory for the Company to comply with and receive for each beneficiary employee his regular leave until the end of his working year, during which he is entitled to receive it, even if he has not submitted an application for its grant.

ABSENCE LICENSES

1. Leave of absence, other than legal, with or without remuneration, at the discretion of the company, is granted only for exceptional and serious personal or family reasons and provided that for this reason is not provided by law or by collective labor agreements special the license or any provision has been exhausted as well as provided that the normal license has also been exhausted. Each employee must explain in writing why he or she is requesting leave, and his / her supervisor needs to agree, as in any case of leave.
2. The granting of a license according to the previous paragraph is not obligatory and does not create any kind of precedent.

WORK TIME

1. Work time is considered only the time of actual employment of the employee in the specified place. The days, the beginning, the end and the breaks of the work are defined by the company depending on the type of work, its needs or the seasonality. The working time does not include the time of going to work or the time of return, the time spent in any way before the start and after the end of work, as well as breaks or breaks of work that may be provided for rest, lunch, coffee, change of clothes etc. Such interruptions do not affect the operation of the respective departments which will be continuous. For breaks, the labor law applies and applies.
2. The company at its discretion and based on its respective needs may determine in total or in sections and positions the start and end time of staff work, breaks, continuous or intermittent hours, morning, afternoon or night work and days work within the week without exceeding the framework of the labor legislation that will be in force each time.
3. The company may employ the employee in other jobs, in order to cover the entire working hours always within the framework of the applicable labor legislation.
4. An employee who is absent is strictly forbidden to declare his presence in any way (eg by tapping a card).

working days

The company applies various work delivery systems in terms of working days and hours, as determined each time by the applicable provisions of labor law.

WORKING HOURS

1. The normal working hours for full time are eight hours a day. Overtime and overtime work are determined in accordance with the provisions of the applicable labor legislation. Every employee must legally perform overtime, overtime, night work on Sundays and holidays according to the needs of the company, due to special needs and based on procedures defined by applicable law.
2. The work program of each department is formulated by the supervisor, who takes into account, as much as possible, the preferences and needs of the staff. Modifications are made by the same procedure.

BREAKS

The breaks are planned by the person in charge and are announced on the staff table. It is not allowed to take breaks continuously at the beginning or at the end of the work.

ABSENCES

The success of the business operation is based on the cooperation of all staff. Increased absenteeism rates not only make it difficult for any activity to proceed smoothly, but also have an adverse effect on employees, who will be called upon to fill the gaps created.

DISEASE

1. It is very important that the company announces the absence of the employee due to illness as soon as possible and, as far as possible, before the start of the patient's working hours. If it is not possible to communicate with the supervisor, the patient should notify the call center or the security guard.
2. The disease must be diagnosed the same day or at most the next day by a doctor of the insurance organization to which the patient belongs. The supporting documents of the insurance organization or public hospital, which will cover the entire period of the employee's absence, must be presented upon his return to work. A certificate from a private doctor is considered only if the employee is not yet entitled to have an illness booklet from the IKA.
3. Violation of the provisions of this article may characterize the absence of any employee as unjustified.

DISEASE BENEFITS

The company is obliged to pay the employee who was absent due to illness, remuneration, as provided by the current legislation, supplementing the social security benefits. The employee must arrange for the sickness insurance or other organization to pay him the sickness benefits provided for him.

PREGNANCY AND BIRTH

1. A pregnant worker must submit as soon as possible an opinion of a doctor of her insurance organization, on the probable date of birth.
2. The pregnancy and childbirth leave is granted in accordance with the current legislation. If the birth occurs before the expected date, the total duration of the leave is not reduced. If the birth occurs after the above date, the remaining leave time is not reduced, ie after the birth the rest of the total duration of the leave is granted.
3. For the benefits of the time of absence due to pregnancy and childbirth, the same applies to the case of absence due to illness.
4. Upon the return of the employee from the maternity leave, she receives the facilities (eg part-time) provided each time by the applicable labor legislation.
5. The provisions for the leave of breastfeeding and child care are applied in proportion to the working time and to the part-time workers.

CONFIDENTIALITY

1. Every employee is obliged not to announce to anyone and in any way both during and after the termination of the employment relationship, documents, data, information, etc. related to the activity of the company. Anyone who is asked by a journalist, refers him to the authorized person in charge.
2. Employees are obliged not to disclose to anyone the wages and benefits they receive from the company.

SUBMITTING COMPLAINTS

1. Any issue or complaint that concerns the employee is also of interest to the company, so it is very important that the employee follows the correct procedure to enable the company to resolve it, as far as possible. The same applies to questions or objections of the employee regarding his salary, in particular for overtime and other additional remuneration or for expenses incurred, which he must present as soon as he receives the relevant payroll.
2. In the cases of the previous paragraph, the employee must discuss the issue that concerns him, first with his immediate superior and if no solution is given, with the competent manager to whom the employee's manager can also address. If necessary, the final discussion will take place with the Administrator.

FIRST HEALTH AND SAFETY

1. The protection of the health and safety of employees in all aspects of work is a primary concern of the company, which is obliged to take all appropriate measures for the safety of workplaces in general (buildings, machines, facilities, etc.). Pi.). The company will ensure the observance of all hygiene and safety rules dictated by the applicable provisions.
2. The company takes care and takes measures to ensure the health and safety of third parties.
3. Every employee must comply with the rules of hygiene and safety for the protection of himself and his colleagues and customers of the company. The cooperation of all colleagues is necessary for the effectiveness of the measures taken by the company to fulfill all its obligations arising from the previous paragraphs and the relevant legal provisions.
4. Anyone who has a health problem and pregnant workers must notify their supervisor in writing of their condition, so that the tasks assigned to them to take care of their health are taken into account.
5. During his service in the company, the employee must undergo periodic or special examinations of his health in the insurance organization where he belongs to in order to determine or maintain his suitability for the job in which he is employed.

SPECIAL TASKS

1. Every employee has the obligation to apply the rules of health and safety and to take care according to his abilities, for his safety and health as well as for the safety and health of other persons, who are affected by his actions or omissions during work in accordance with his training and the appropriate instructions of his supervisor.
2. All employees must: a) Use properly the machines, devices, tools, hazardous substances, transport and other means related to the performance of their work. b) to use properly the personal protective equipment available to them (Personal Protective Equipment eg gloves, goggles, helmet) and after use to arrange it in place. c) not to deactivate, change or displace arbitrarily the safety mechanisms of machines, tools, devices, installations and to use these safety mechanisms correctly; d) to report immediately to their supervisor, safety technician and occupational physician all situations which may reasonably be regarded as posing an immediate and serious risk to safety and health as well as any deficiencies found in the protection systems; the duties or requirements for the protection of the safety and health of workers at work health of their field of activity.
3. For the operation, repair and maintenance of all kinds of machinery and installations, the appropriate instruments and materials must be used, which are indicated by the competent manager or manager of the factory.
4. Employees are prohibited from operating and using machinery, tools or installation, which do not fall within its competence and has not received a relevant order.
5. All employees must willingly comply with the written agreed instructions of the technical supervisors, regarding the existing provisions "on the health and safety of employees in the workplace". It is expressly forbidden, in order to avoid accidents, to operate on moving machines and to remove protective equipment.

KNOWLEDGE OF AN INDIVIDUAL BOOKLET

1. Every employee has the right to receive knowledge of his personal booklet. According to the law, the health inspectors of the competent inspection and the doctors of the employee's insurance organization have the same right.
2. After the termination of the employment relationship, the individual booklet is delivered to the employee. The company may keep a copy of the employee's personal booklet and after his departure, in order to be able, whenever called by the competent bodies, to provide explanations for the observance of hygiene and safety conditions in relation to the specific employee.

WORK ACCIDENTS

1. Any accident both inside and outside workplaces, must be reported immediately to the management of the company, which will take the necessary actions in accordance with the law.
2. In case of a work accident, the one who is closest, must immediately and without order stop his work and notify his Supervisor. The Head, with the help of the staff, must offer the first aid to the victim, take care of his immediate arrival at the IKA doctor's office or at the First Aid Station and give, if the patient's condition does not allow him the necessary information for the preparation of the relevant Accident Report.

3. The Directors and Heads of Departments as well as those in charge of supervising the departments of the company regulate the procedures for dealing with accidents, both from a formal and substantive point of view, informing the Management of the company. Their actions are: a) The immediate response of the accident in terms of provisional assistance. b) The care for sending the injured person to the nearest first aid station or to the IKA doctor's office. c) The preparation of the relevant Accident Report and its submission through the personnel department as soon as possible to the competent service of IKA and the Ministry of Labor. d) The preparation of a special report by the Head of the Department where the accident occurred, regarding the causes, conditions and the manner in which the accident occurred. In the event of a serious injury, the report must include the testimony of all those present at the time of the accident. This special report will be submitted to the Management of the company as soon as possible.

No smoking

Smoking is allowed only during the break and only in the designated areas.

FREE MOVEMENT

1. It is forbidden to deposit even for a while any kind of objects in the traffic corridors in the stairwell and in the stairs that lead to the normal exits and the emergency exits as well as inside or outside the emergency exits, which must be possible to use from a large number of persons at any one time.

2. It is forbidden to hide and prevent the access of the firefighting material. Employees must immediately report to the supervisor any obstruction they encounter in the corridors at the exits and in the easy access of the fire-fighting equipment. Likewise any difficulty or damage to the exit doors and any damage to the safety and health markings.

EMERGENCY PLAN

1. The buildings and facilities of the company meet all safety standards. In the event of an emergency (eg earthquake, fire, power outage) each worker must behave as required by the relevant plan, in terms of providing first aid, use of firefighting equipment, evacuation of premises, notification of competent authorities etc.

2. In addition to participating in training for dealing with emergencies, every employee has the right to request clarifications at any time from his boss or the leader of the fire safety team.

COMPOSURE

Keeping calm is the safest way to deal with any danger.

DISCIPLINARY OFFENSES

Disciplinary misconduct is any violation of the law, this regulation, other rules and procedures or the lawful order of a supervisor.

DISCIPLINARY PENALTIES

1. The disciplinary penalties are: a) oral or written observation, b) written reprimand, c) fine up to 25% of the salary or 1/25 of the monthly salary at the time of its imposition and in case of recurrence of the violation doubling of this fine d) temporary leave of up to five days in the same calendar year.

2. The disciplinary penalty will be proportional to the gravity of the specific misdemeanor. Relapse is an aggravating case.

3. The fines according to the law are deposited in the Bank of Greece, in the name and on behalf of the Labor Center.

4. In case of violation which constitutes at the same time a criminal offense, the company can initiate criminal proceedings, regardless of the imposition of the disciplinary penalty.

5. The initiation and completion of the disciplinary procedure is in no case a condition for the company to exercise any of its legal rights, nor is it a condition for any termination of the employee's employment contract.

TERMINATION OF LABOR RELATIONSHIP

The company's policy is to avoid dismissals, but reserves the legal right to terminate any contract of employment at any time without explaining the reason as permitted by Greek law. No provision of the Labor Regulations means that it restricts the free and unconditional exercise of this right of the Company. The termination of the fixed-term employment contract occurs upon its expiration and does not constitute its conversion into an indefinite-term contract, the employee's inadvertent stay at work, beyond the expiration.

Arbitrary absence of the employee, when repeated despite the relevant remarks of the employer, regardless of the reduction of the respective wages or salary, can be considered in cases and as termination of the employment contract through the fault of the employee under the terms of the law.

ENTRY INTO FORCE

The validity of the Regulation starts 10 days from its posting in each workplace and it is presumed that all employees have received full knowledge of this content.

12/06/2020

ΟΝΟΜΑΤΕΠΩΝΥΜΟ ΔΙΑΧΕΙΡΙΣΤΗ ΕΤΑΙΡΙΑΣ THELMA FRESH

.....Γκουντόπουλος Γρηγόριος.....

ΣΦΡΑΓΙΔΑ/ΥΠΟΓΡΑΦΗ



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