

PREMIA

Properties

CODE OF CONDUCT

JULY 2021

Περιεχόμενα

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DOCUMENT REVIEW TABLE

	Drafting / Review Date	Brief amendment description
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Version 2		

1. On the Code of Conduct

Premia Properties was founded in 1991 (under the name "Pasal Real Estate Development Société Anonyme"), and since 2008 its shares are traded on the Athens Stock Exchange. The Company is active in managing and operating real estate, holding a leading position in the industry. At the beginning of 2021, the Company's name changed from "Pasal Real Estate Development Société Anonyme" to "Premia Société Anonyme" and the brand name "Premia Properties" ("the Company" or "Premia") to mark its entrance in a new era of dynamic growth.

Premia's strategic key growth drivers are the investments in commercial real estate with an emphasis on the logistics and big-box properties and public-use properties, such as schools, hospitals and nursing homes through various forms of investment, including Public-Private Partnership (PPP) projects.

Through its operation, Premia also contributes to the quality redevelopment of urban buildings, as it seeks to invest in buildings with specific energy and environmental characteristics that also satisfy its tenants' requirements to the largest possible extent. The Company, therefore, promotes the Global Sustainable Development Goals (SDGs) as it contributes to the quality of city life improvement for those who live and work in the buildings that it owns.

What the Code of Conduct denotes

This Code presents the set of principles and rules that govern the Company's operation and outlines the behavior that Premia expects from employees and associates (suppliers and customers). It portrays Premia's commitments and requirements regarding ethical business practices and describes the broader framework that the Company has defined to cooperate with its tenants, suppliers, its executives and employees.

Whom it concerns

The Company's Code of Conduct applies to all Premia's employees, associates, suppliers and tenants. It aims to highlight corporate values, describe the principles of business ethics and conduct by which the Company operates and act as a point of reference for the daily professional performance of its employees and associates. The Code is available on the corporate website (<http://www.premia.gr/>).

2. Our Values

According to Premia's corporate culture since its foundation, it operates and continuously grows, honouring its corporate values, that are outlined below:

ETHICS & INTEGRITY

Integrity characterizes the way we operate. It constitutes a critical element of our corporate culture. We honor our agreements and are true to our employees, tenants, suppliers, associates, the State and other entities. With our actions, we reward honesty and ethics, strive for transparency, and keep our word. We are fair.

RELIABILITY

We honor our commitments to tenants, associates, shareholders, and the society as a whole. In each of our actions, our goals are realized through prudent business planning. We wish for our services to continue to guarantee our reliability.

CORPORATE RESPONSIBILITY

Responsible business conduct stands at the core of our operations. We give special attention to Corporate Social Responsibility matters relating to corporate governance, to our employees' further development, to environmental care as well as the contribution to society at large.

COOPERATION & TEAMWORK

We combine and leverage our people's skills and years of experience. We consider our tenants and suppliers as our associates. We share ideas and expertise and we are open to new ideas.

3. Standards of ethical and business conduct

The Company is governed by and operates based on specific ethical and business conduct standards, which must be observed by both the Company's management and all its employees and associates. These standards address the following key issues:

Regulatory compliance

Compliance with laws and regulations

Premia operates with integrity and is fully compliant with laws and regulations pertaining to its activities. It continuously monitors developments and responds accordingly as needed. The Company's employees are expected to act honoring its values and principles and to comply with applicable laws and regulations.

Bribery & corruption

The Company is against and condemns any kind of bribery and any practice of corrupt or illegal business activity. Any form of bribery, namely the acceptance or offer or promise of gifts, facilities, financial rewards or any other benefit to individuals or legal entities, but also to public officials and civil servants, with the aim to achieve an unfair competitive advantage, is prohibited. Premia's management team and all its employees are subject to this Code of Conduct, as well as all associates that have accepted to adhere to it, are committed to act with absolute integrity and honesty inside and outside the Company, conforming to national and international anti-corruption legislation. In addition, the Company absolutely prohibits any kind of activity pertaining to illegal financing or money laundering and strictly observes all relevant laws and regulations.

Fraud prevention

The Company does not tolerate any fraud incident and is committed to the principles of transparency and integrity. Premia's management has the responsibility to prevent, monitor, and take appropriate action in the event of fraud. It constantly monitors the procedures and oversees the evaluation, prevention, and tackling of fraud-related matters, while individuals and departments are obliged to follow them rigorously.

Conflict of interest

A conflict of interest exists if a corporate executive or employee or a member of their family promotes their personal interests, which may be contrary to those of the Company, resulting in a conflict of interest. Both management and employees must commit to avoiding situations that could lead to a conflict between their personal and corporate interests and act under provisions of the Policy and Procedure for preventing and tackling conflict of interest situations.

Personal data and corporate information protection

Premia is committed to adopting necessary technical and organizational measures to protect and safeguard personal data and confidential information. In full compliance with the applicable law, any secret trade, exclusive information on customers or associates, contract or financial position is considered confidential, and all necessary procedures to safeguard its protection are implemented. Every employee must follow those procedures and not disclose confidential information to third parties or entities (such as financial, technical, or commercial data or confidential or non-publicly available documents).

Financial and non-financial information

The accurate preparation of financial and non-financial data and reports is a priority for the Company, as it always pursues transparency with third parties. All financial transactions are always recorded and published under International Financial Reporting Standards, while the Company applies strict control mechanisms that ensure that both financial and non-financial information is free from material inaccuracies.

4. Stakeholder relations

Customer/tenant relations

Premia's long-standing corporate priority is to create added value, both for its shareholders and its people. The Company aims to retain its executives' expertise and knowledge and build on them to continuously expand its customers and associates' network, reinforcing its operations in the real estate industry. It is also committed to act in a responsible manner towards its tenants and to meet their needs and expectations, strengthening relations with existing and potential tenants that may constitute a quality addition to its overall performance.

Respecting competition rules

It is a corporate priority for the Company to promote free and fair market competition, and all employees and close associates are expected to avoid any kind of unfair transactions, always abiding by the relevant legislation. The Company prohibits any conduct that restricts or impedes free and fair competition, while any agreement or even discussion with competitors regarding the setting of prices or other trading details is unacceptable and considered a breach.

Stakeholder relations

The Company is committed to openly communicate with its stakeholders on their needs and concerns and will make every effort to deliver accordingly. This will allow the Company to continuously improve its overall performance.

5. Caring for employees

PREMIA is committed to foster relations based on respect and trust with its employees while ensuring their continuous growth and development. The Company provides training and development opportunities for its employees, objectively evaluates their performance and skills, and offers equal opportunities regardless of origin, gender, beliefs, or other personal traits. PREMIA also condemn and will not tolerate any form of discrimination or harassment.

Defending human rights

Working conditions that contradict to the national or international law and human rights practices, particularly the United Nations Universal Declaration of Human Rights code, are unacceptable to the Company. We stand against any form of child or forced labor and do not accept unprofessional behavior such as sexual harassment or bullying. The Company ensures that no situation may induce a human or labor rights violation across its operation. The Company is also committed to provide equal opportunities and fights against work discrimination.

Employee health & safety

Promoting its employees and associates' health and safety is Premia's long-lasting goal. All employees must perform their duties in a professional manner with respect to the health & safety regulations and to participate in relevant awareness programs.

Protecting corporate assets

The Company expects its employees to manage its assets responsibly and pays special attention to avoid loss, theft, harm, undue costs, misuse, or even inappropriate or unauthorized use of these assets. Employees must equally respect the Company's tangible and intangible assets and those of its associates, which should be appropriately managed and only for the intended business purposes.

Respect for the environment

The Company is committed to carry out actions that protect the environment and continuously reduce its ecological footprint, as respect for the natural resources is also a priority. As buildings in Europe account for 40% of total carbon dioxide emissions, the Company seeks to invest in properties that are more environmentally friendly and are now a staple item of smart cities. Premia also expects every employee to actively contribute to these efforts, implementing and reinforcing corporate procedures regarding the protection of the environment.

Corporate responsibility and social contribution

Premia seeks to support local communities where its properties are located. The Company also realizes the value of volunteering and the employees' overall collective effort.

6. Compliance with the Code

Scope

The Code of Conduct as well as the related procedures that are being addressed apply to:

- i) the Company's employees
- ii) associates and advisors who represent or operate on behalf of the Company.

In the event of any discrepancy between the applicable laws and regulations, and the standards set out in this Code, the highest standard under the applicable national law shall apply. Violation of this Code or applicable laws may result in disciplinary proceedings internally, dismissal or even prosecution.

The Company's Regulatory Compliance Unit is responsible for addressing questions that may arise on applying the Code of Conduct.

The Code of Conduct is approved by Premia's Board of Directors. Any deviance is reviewed by the Managing Director and approved by the Board of Directors.

Monitoring and code amendments

The Company's Executive team, the Internal Audit Unit and the Regulatory Compliance Unit are responsible for monitoring compliance with the Code.

The Code of Conduct shall be updated based on the current legal framework and International Standards. Following recommendations/suggestions made from the Regulatory Compliance Unit as well as the Internal Audit Unit, respectively, the Company shall amend the Code to adapt its content according to changes implied either due to changes in the current legislative/regulatory framework or amendments of its corporate principles.