

TECHNAVA S.A.

CODE OF CONDUCT

1. Preface

The integrity, respect for others and sound judgement of the employees, executives and affiliates of Technava S.A. (“Technava” or the “Company”) are fundamental to the proper functioning and continued success of the Company. This Code of Conduct (the “Code”) sets out the standards of conduct that all such persons are expected to observe.

2. Purpose

The Code describes the professional and personal behaviour expected of all employees, executives and affiliates when representing Technava. Its purpose is to promote integrity and ethical conduct and to guide interactions with colleagues, clients, suppliers, business partners, public authorities and the general public.

The Code supplements, and does not replace or limit, any other legal, contractual or regulatory obligation applicable to the Company or to the persons to whom the Code applies. If applicable law requires a higher standard than the Code, applicable law prevails.

3. Scope

The Code applies to all employees of Technava (full-time, part-time and fixed-term), to members of its Board of Directors and senior management, and to all affiliates engaged to act on behalf of the Company, regardless of location. It applies whenever such persons carry out duties for Technava, including when working remotely, travelling on business, attending conferences or representing the Company at any public occasion.

Where appropriate, relevant provisions of the Code are extended to contractors, consultants, agents and other third parties by way of their contractual arrangements with the Company.

4. Definitions

- “Manager” means the direct supervisor of an employee or executive.
- “Affiliate” means any individual or entity that is engaged by Technava to perform services on its behalf without being a direct employee of the Company, including agents, consultants and intermediaries.
- “Applicable law” means any law, regulation or binding rule in force in Greece, in the European Union, or in any other jurisdiction in which Technava operates, as amended from time to time, and includes any subordinate legislation made under it.

5. Personal and Professional Behaviour

The conduct of employees, executives and affiliates must be consistent with Technava’s values and with the principles set out in this Code. Persons subject to the Code are required to comply with applicable law, any applicable collective labour agreement, any professional code of practice that applies to them, and all Company policies. In particular, they shall:

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- observe the principles of equal treatment and non-discrimination, and refrain from harassment, bullying and any other unwanted conduct contrary to Law 3896/2010, Law 4443/2016 and Law 4808/2021 (which ratifies ILO Convention No. 190);
- use Company resources responsibly and only for legitimate business purposes;
- protect the Company's reputation in the wider community;
- protect the Company's intellectual property and business information;
- maintain and develop their professional expertise and share it with colleagues when appropriate;
- exercise sound professional and ethical judgement and act with integrity and objectivity;
- work with honesty, diligence and due care in pursuing the Company's objectives;
- treat colleagues, affiliates, visitors and members of the public fairly, courteously and with respect;
- maintain cooperative and collaborative working relationships;
- keep to appropriate standards of behaviour, language and dress in the workplace;
- not incur any liability on behalf of the Company without proper authorisation.

6. Equality and Respect at Work

Technava is committed to a working environment free from discrimination, harassment and any form of violence, in line with Law 4808/2021, Law 3896/2010 and Law 4443/2016. All persons subject to this Code shall:

- treat employees, executives, affiliates, visitors and members of the public with dignity and respect;
- not allow personal relationships to interfere with professional relationships or business decisions;
- act and communicate in a professional and courteous manner at all times;
- refrain from any conduct that would unfairly harm the reputation, wellbeing, health and safety, property or career prospects of another person; and
- where appropriate, intervene constructively and report any conduct that appears to breach this Code.

7. Criminal Charges and Convictions

Employees, executives and affiliates shall inform the Human Resources Department if, during their employment or engagement with Technava, they are formally charged with or convicted of a criminal offence that could reasonably affect the performance of their duties or expose the Company to legal, financial or reputational risk. The Human Resources Department, in consultation with the relevant executive manager and the Chief Executive Officer, will assess the relevance of the matter to the person's role, taking into account the requirements of applicable law, including Law 4624/2019 on the protection of personal data.

8. Health and Safety at Work

Technava is committed to providing a safe, healthy and productive workplace in accordance with Law 3850/2010 (which codifies the Greek legislation on occupational health and safety) and related provisions. Every employee, executive and affiliate has a duty to take reasonable care of

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their own health and safety and that of other persons who may be affected by their acts or omissions at work, and to follow Company health and safety instructions and procedures.

9. Recruitment and Selection

Recruitment and selection at Technava are based on merit and are carried out in a manner that is fair, transparent and lawful. Candidates shall not be discriminated against on any ground prohibited by applicable law.

10. Ethical Decision-Making

In making decisions in the course of their duties, employees, executives and affiliates shall consider:

- whether the decision complies with applicable law and with Company policy;
- whether the decision gives rise to any actual, potential or perceived conflict of interest; and
- the possible impact of the decision on others and on the reputation of the Company.

11. Financial Management, Fraud and Corruption Prevention

Employees, executives and affiliates shall:

- act to minimise the Company's exposure to fraud and corruption;
- report any suspected fraud, corruption, criminal conduct or unethical behaviour, and any misuse of Company assets, in accordance with the Anti-Bribery and Corruption Policy and the Anti-Retaliation Policy;
- ensure the proper use and management of Company funds and assets for which they are responsible;
- maintain effective internal controls over financial transactions;
- identify and manage financial risks within their remit;
- keep accurate accounting records in line with Greek accounting standards and applicable tax law; and
- comply with Law 4557/2018 on the prevention of money laundering and terrorist financing, to the extent that it applies to the Company's activities.

12. Use of Company Resources and Reputation

Every employee, executive and affiliate has a duty to protect and uphold the reputation and assets of Technava, and to use Company resources only for legitimate business purposes.

13. Public Comment

Employees, executives and affiliates who do not have express authority to speak on behalf of the Company shall:

- not make any public statement on behalf of Technava, or hold themselves out as a spokesperson for the Company, unless expressly authorised by the Chief Executive Officer or a person nominated by the Chief Executive Officer;
- consider carefully whether any public or private comment on the Company's activities is at odds with the Company's values or its stated positions; and
- refrain from making comments in a private capacity that could reasonably be perceived as being made on behalf of the Company.

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Nothing in this clause is intended to restrict the right of any person to express personal opinions in a private capacity, or as a member or representative of a professional, community or representative body, provided that those opinions cannot reasonably be attributed to the Company.

14. Publication of Work-Related Material

Employees, executives and affiliates shall not publish material that relates to the Company's business or operations unless:

- the matter has been discussed with the person's manager and the relevant business unit executive;
- a draft of the material has been provided to the Communications / Public Relations Department for review and approval; and
- the material is not linked to the Company, unless expressly authorised by the Chief Executive Officer.

15. Use of Social Media

"Social media" in this Code means online platforms and resources that are used to share information, including (without being limited to) Facebook, X (formerly Twitter), LinkedIn, YouTube, Instagram, TikTok, blogs, forums and similar sites.

When using social media, employees, executives and affiliates should be aware that content published there is generally publicly available. Their online conduct must comply with applicable law, with this Code and with any other applicable Company policy. This applies whether the use is professional or private where the person is identifiable as being connected to the Company.

16. Use of Information and Communication Technology

The Company's ICT resources, including email, devices and networks, are provided for business purposes. Technava reserves the right, to the extent permitted by applicable law (including Law 4624/2019 and Regulation (EU) 2016/679), to monitor, access and review data stored or transmitted through those resources.

17. Intellectual Property

Technava relies on its intellectual property to conduct its business. All employees, executives and affiliates have a role in ensuring that the Company's intellectual property, including trademarks, copyright, know-how and trade secrets, is protected and used only for proper business purposes. Subject to applicable law, intellectual property that is created by employees in the course of their duties belongs to the Company.

18. Confidential Information

Technava collects and holds confidential and personal information relating to its clients, its people and its business partners. This information must not be disclosed to any unauthorised person. Access is limited to those who need the information in order to perform their duties, and the information must be kept secure.

Employees, executives and affiliates shall comply with the Company's confidentiality obligations and with applicable data protection legislation, including Regulation (EU) 2016/679 (GDPR) and Law 4624/2019. These obligations continue after the termination of employment or engagement.

19. Conflicts of Interest

Employees, executives and affiliates shall disclose to the Company any actual, potential or perceived conflict between their personal interests and the interests of the Company, and shall complete a Conflict-of-Interest Disclosure Statement where required. The Company will take reasonable steps to manage any conflict that is disclosed.

20. Gifts, Benefits and Bribes

Any gift or benefit that is not occasional and of nominal value should be declined, on the basis of this Code. Where a gift cannot practically be refused without causing offence, it may be accepted on behalf of the Company and retained by the relevant business unit, and must be recorded as required by the Anti-Bribery and Corruption Policy.

Bribes, kickbacks and facilitation payments are prohibited in all circumstances. Further detail is set out in the Anti-Bribery and Corruption Policy.

21. Accountability

Employees, executives and affiliates are required to:

- attend mandatory training relating to the Code;
- act in a way that upholds Technava's values;
- act with care and diligence;
- treat everyone with respect and courtesy, and without harassment or discrimination;
- comply with all applicable Greek and European Union law, and with any other applicable law in jurisdictions in which the Company operates;
- comply with any lawful and reasonable direction given by a person authorised to give it;
- maintain appropriate confidentiality;
- take reasonable steps to avoid, and where that is not possible to disclose, any actual or perceived conflict of interest;
- report any suspected breach of the Code, or any other ethical concern, in accordance with clause 25; and
- read, understand and comply with this Code.

22. Managers and Executives

In addition to the general responsibilities above, managers and executives shall:

- promote compliance with the Code within their area of responsibility;
- assist with queries on the Code, or refer them to the Chief Executive Officer or the Human Resources Department;
- receive reports of suspected breaches and escalate them to the Chief Executive Officer or the Human Resources Department in accordance with clause 25; and
- maintain confidentiality, unless disclosure is required by law.

23. Human Resources Department

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In addition to the general responsibilities above, the Human Resources Department shall:

- provide the Code to employees, executives and affiliates on engagement and on request;
- assist with queries on the Code, or refer them to the Chief Executive Officer; and
- receive and escalate reports of suspected breaches of the Code to the Chief Executive Officer.

24. Chief Executive Officer

In addition to the general responsibilities above, the Chief Executive Officer shall:

- promote compliance with the Code across the Company;
- receive and act on reports of suspected breaches and other ethical matters;
- approve amendments to the Code as and when required; and
- report material matters arising under the Code to the Board of Directors.

25. Reporting Suspected Breaches

Technava encourages and supports the reporting of suspected breaches of the Code. Reports may be made to any manager, to the Human Resources Department, or to the Chief Executive Officer.

Reports may also be made in confidence, and if the reporter so wishes anonymously, by email to compliance@technava.gr. They will be handled in accordance with Law 4990/2022 (which transposes Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law) and the Company's Anti-Retaliation Policy. No person will suffer detriment as a result of making a report in good faith.

A preliminary assessment will be carried out on receipt of a report. Investigations will be conducted as quickly as proper consideration of the matter allows. Where the reported conduct may also amount to a criminal offence, the Company may, and in certain cases must, refer the matter to the competent authorities.

26. Handling of Suspected Breaches

The Chief Executive Officer, or a person designated by the Chief Executive Officer, will make the initial assessment of each report. If the matter is to be dealt with formally, an internal or external investigator may be appointed. The person under investigation will be informed of the substance of the allegations and given a reasonable opportunity to respond, subject to any restrictions necessary to preserve the integrity of the investigation or to comply with applicable law.

27. Consequences of Breach

Employees, executives and affiliates hold positions of trust in representing Technava and are responsible for their professional and personal conduct. Breaches of the Code are treated seriously. The Company's response will be proportionate and will take into account the severity of the breach, whether the conduct has been repeated, the risks to the Company and to individuals, and whether criminal proceedings may follow.

For employees, breaches may lead to disciplinary action up to and including termination of employment, in accordance with applicable labour law. For affiliates, breaches may lead to termination or non-renewal of the engagement and, where appropriate, to claims for damages.

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The Company may also report conduct to the competent authorities where that is required or appropriate.

28. Application of the Code

The Code is not an exhaustive list of acceptable or unacceptable conduct. It sets out the principles by which Technava expects its people to act. If a situation arises that is not expressly covered by the Code, the person concerned must apply the principles of the Code and refrain from any conduct that would be inconsistent with them.

Anyone who is unsure about how the Code applies in a particular situation should seek guidance before acting. Employees and executives should contact their direct manager. Affiliates should contact their Technava point of contact. Questions may also be addressed to the Chief Executive Officer or to the Human Resources Department at compliance@technava.gr.

All such discussions will be treated in confidence, unless disclosure is required by law.

29. Acknowledgement

All employees, executives and affiliates will receive the Code on commencement, and will be asked to confirm that they have read, understood and will comply with it. A copy of the Code may be requested at any time from the Human Resources Department at compliance@technava.gr.