

PREMIA

Properties

CODE OF CONDUCT

JULY 2021

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DOCUMENT REVIEW TABLE

#	Drafting / Review Date	Brief amendment description
Version 1	07.07.2021	
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 REAL ESTATE INVESTMENT COMPANY " 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/big boxes 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, buildings that also satisfy its customers – 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 it manages.

What the Code of Business Ethics & Conduct denotes

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

Whom it concerns

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

2. Our Values

Ever since Premia was founded, it operates and grows, honouring its values, which it considers the core of its corporate culture. The corporate values are:

ETHICS & INTEGRITY

Integrity characterises the way we operate. It constitutes a critical element of our corporate culture. We honour our agreements and are honest with our employees, customers, suppliers, associates, the State and entities. With our actions, we reward honesty and ethics, strive for transparency and keep our word. We are fair.

RELIABILITY

We honour our commitments to customers, associates, shareholders and society. In each of our actions, our goals are realised through careful business planning. We want our services to continue to guarantee our reliability.

CORPORATE RESPONSIBILITY

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

COOPERATION & TEAMWORK

We combine and leverage our people's skills and years of experience. We consider our customers and suppliers our associates. We share ideas and expertise; 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, respecting laws and regulations and fully complying with the laws pertaining to its activities. It constantly monitors developments and immediately responds to them. Accordingly, all Company's employees are expected to act honouring 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. In this light, 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 and all employees, who are subject to this Code of Conduct, as well as all Company's associates who have accepted to adhere to it, are committed to acting 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, constantly monitoring the procedures and safeguards for the evaluation, prevention, and tackling of fraud-related matters, while individual departments 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 organisational measures to protect and safeguard personal data and confidential information. In full compliance with the applicable law, any

trade secret, 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

Accurate, correct and complete preparation of financial and non-financial data and reports is a priority for the Company, as it always pursues transparency in its relations 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

Creating added value, both for its shareholders and people, as well as for its customers - tenants and associates, is a long-standing corporate priority. The Company aims to retain its executives' accumulated 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 acting responsibly towards its customers - tenants and meeting their needs and expectations, substantially bolstering relations with existing and potential customers who may constitute a quality addition to its portfolio.

Respecting competition rules

Promoting free and fair market competition, while also expecting all employees and close associates to avoid any kind of unfair associations, is also a corporate priority, always abiding by competition 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 of the obligation for corporate loyalty.

Stakeholder relations

The Company is committed to openly communicating with its stakeholders, recording their needs and expectations, and making every effort to live up to them. Discourse with stakeholders allows the Company to continuously improve its performance and rendered services.

5. Caring for employees

PREMIA is devoted to fostering 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 condemns and will not tolerate any form of discrimination or harassment in its workplaces and operations.

Defending human rights

Working conditions that contradict national or international law and human rights practices, particularly the United Nations Universal Declaration of Human Rights, are unacceptable to the Company. We stand against any form of child or forced labour, do not accept unprofessional behaviour such as sexual harassment or bullying and make sure that no situation may induce a human or labour rights violation across our operations. The Company is also committed to providing equal opportunities and fighting against any discrimination at work.

Employee health & safety

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

Protecting corporate assets

The Company expects its employees to manage its assets responsibly and appropriately and pay special attention to avoiding loss, theft, harm, undue costs, misuse, or even inappropriate or unauthorised 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 pledges to carry out actions to protect the environment and continuously reduce its footprint, as respect for the natural environment 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 protecting the environment.

Corporate responsibility and social contribution

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

6. Compliance with the Code

Scope

Code of Conduct as well as the related procedures are addressed, concern and 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.

Monitoring and code amendments

The Heads of the Company's departments, the Internal Audit and the Regulatory Compliance Units 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 of the Regulatory Compliance and Internal Audit Units, respectively, Premia's management revises the Code to adapt its content to possible changes either in the current legislative/regulatory framework or the corporate principles.