



# EMPLOYEES INTERNAL WORKING REGULATION OF HiSCS S.M.S.A. CODE OF ETHICS





## Contents

---

GENERAL .....	3
DEFINITIONS AND PRINCIPLES .....	3
EXTENT OF VALIDITY OF REGULATION.....	3
CONFIDENTIALITY .....	3
HEALTH REGULATIONS.....	4
USE OF ELECTRONICS (MULTI) MEDIA AND NETWORK .....	4
POLICY OF LOST ELECTRONIC DEVICE .....	5
ARCHIVING .....	5
WORKING SCHEDULE AND PLACE.....	5
WORKING RELATIONS.....	5
ELECTRONIC CUSTOMERS ARCHIVE.....	6
LEAVES .....	6
DRESS CODE .....	6
NON-SMOKING REGULATION .....	6
COFFEE AND LUNCH BREAK.....	7
ASSESSMENT OF PERSONNEL .....	7
TERMINATION OF EMPLOYEMENT CONTRACT.....	7
ORGANIZATION CHART .....	8
FINAL PROVISIONS .....	9



## GENERAL

The company named «**HiSCS S.M.S.A. – Highway Special Construction Systems S.M.S.A.**», hereby issues the following Internal Working Regulation and Code of Ethics.

## DEFINITIONS AND PRINCIPLES

- For the purposes of this Internal Working Regulation and Code of Ethics, the term “Company” refers to HiSCS S.M.S.A., while the term “Employee” refers to any individual who, under an employment agreement, provides paid services of any kind to the Company.
- The purpose of this Regulation is to govern, in accordance with applicable labor laws, all employment relationships formed between the Company and its employees in the course of their duties.
- The Company’s operations are managed and monitored in accordance with this Regulation, the applicable legislation, and the decisions of the Board of Directors or the General Manager.
- This Regulation is binding for both the Company and its employees, and its provisions remain in effect even after the termination of the employment relationship.
- The Company reserves the right to amend or supplement this Regulation in compliance with applicable legal and institutional frameworks.

## EXTENT OF VALIDITY OF REGULATION

- All Company personnel, regardless of department or whether employed under a fixed-term or indefinite contract, are subject to the provisions of this Regulation. This includes part-time, full-time, and privately contracted employees.
- This Regulation also applies to all personnel engaged under independent service, project-based, or commission contracts, where applicable.
- The Regulation enters into force upon being posted in a visible and accessible area within the Company’s premises and upon signature by each newly hired employee.
- Prior to commencing employment, each employee is both entitled and obligated to review the contents of this Regulation. Upon hiring, the Company may require the employee to sign a written statement confirming that they have read, understood, and agreed to comply with the Regulation.
- The Regulation becomes effective from the date it is approved by the Board of Directors or the General Manager.

## CONFIDENTIALITY

- All personnel subject to this Regulation are required to treat all information, documents, and data—particularly those related to the Company’s clients—as strictly confidential.
- The use, disclosure, or distribution of privileged information obtained during work execution, including information concerning clients or potential clients, is strictly prohibited.
- All employees must take all necessary measures to protect such confidential data. These measures may include, but are not limited to:
  - Avoiding the mention of client names or information in public settings
  - Storing documents securely
  - Ensuring complete destruction of documents before disposal
- Access credentials to the Company’s digital resources (e.g., PCs, laptops, LANs, corporate email accounts,



platforms, social media, etc.) are strictly personal and may be used solely by the employee to whom they are assigned.

- The sharing of usernames and passwords is expressly forbidden, whether with external parties or between employees, especially when such credentials are unique to the individual.
- All portable storage devices (e.g., USB drives, external hard drives) used for work purposes must be password-protected, and access should be limited to the authorized user only.
- Electronic equipment provided by the Company is considered a professional tool and is to be used exclusively for business purposes. Upon termination of employment, all such equipment must be returned in working condition. The employee must also immediately discontinue use of any remaining electronic access points provided by the Company.

## HEALTH REGULATIONS

- The Company is responsible for ensuring that all offices, workspaces, and shared facilities comply with health and hygiene standards.
- Employees are equally responsible for maintaining cleanliness and order in their individual and shared workspaces. This includes keeping personal workstations in good condition and ensuring documents are stored and organized properly.

## USE OF ELECTRONICS (MULTI) MEDIA AND NETWORK

- Unauthorized copying or use of licensed software owned by the Company, including use outside of the corporate network, is strictly prohibited.
- Employees may be granted access to various types of software—such as word processors, technical documentation tools, and enterprise platforms—or may be permitted to develop their own, only with prior approval.
- Employees are responsible for protecting the Company's electronic equipment from both physical and digital threats, including unauthorized access via remote desktop or third-party connections.
- When leaving a workstation, even temporarily, employees must lock their computers and close any open files or network sessions.
- The use of the Internet for entertainment purposes (e.g., videos, online games, social media) is prohibited, unless explicitly permitted due to the employee's job responsibilities.
- Only software approved and authorized by the Company may be installed or used. Installation or upgrades must be coordinated with the designated IT personnel.
- The email address assigned by the Company is strictly for professional use and may not be registered on websites or platforms for non-business purposes.
- Due to cybersecurity risks (e.g., spam or phishing emails), employees must not open suspicious links or attachments, especially those promising money, prizes, or gift unless verified by antivirus software and deemed safe.



## POLICY OF LOST ELECTRONIC DEVICE

- In the event of loss of any electronic device containing company or client data, the employee must notify the Company immediately.
- In coordination with the Company, the employee must also report the loss to the nearest police station without delay. Authorities should be informed that the lost device may contain sensitive and confidential information related to clients.

## ARCHIVING

- Due to the nature of the services provided by the Company, the maintenance of a physical archive may be required.
- The core principles of proper file management include organization, security, maintenance, and cleanliness. All employees are obligated to uphold these principles to protect the Company's reputation and maintain effective business relationships.
- The archive must be protected from environmental risks and stored in secure, access-controlled areas.

## WORKING SCHEDULE AND PLACE

- Working hours and employee attendance are regulated in accordance with applicable labor laws and declared to the competent labor inspectorate.
- Employees must strictly adhere to their assigned start times. In exceptional cases requiring late arrival (e.g., personal reasons, client visits, or meetings with public authorities), employees must inform the Company in accordance with established labor law procedures.
- The Company reserves the right to monitor and verify employee attendance.
- Employees are expected, within the scope of their assigned duties, to provide overtime or weekend work as permitted by law, unless a valid reason prevents them from doing so.
- Overtime must be pre-approved by the Company and performed exclusively for business purposes. Remaining at the workplace beyond scheduled hours without approval does not qualify as overtime and is not subject to compensation.
- Employees in executive roles, as defined by labor law and legal precedent, are not subject to fixed working hours.
- The employee's place of work includes all current and future Company facilities, both in Greece and abroad, as well as any client sites where services are to be provided or where employee visits are required.

## WORKING RELATIONS

- All employees must maintain a professional demeanor in all interactions with clients, the general public, and colleagues.
- Communication, whether internal or external, should always reflect the Company's mission, values, and commitment to excellence. All communication policies are directed and overseen by the Company.
- Personnel governed by this Regulation are also expected to pursue ongoing education and professional development relevant to their field. The Company encourages and supports structured learning activities to this end.
- Oral and written communication with clients and among colleagues must be clear, accurate, and efficient. To support this, the Company may issue specific communication guidelines or training to ensure consistent professionalism in all correspondence.



## ELECTRONIC CUSTOMERS ARCHIVE

- Each employee is required to maintain and update the Company's digital records with all essential documents related to their assigned clients.
- Such documents include (but are not limited to) proposals, contracts, technical specifications, correspondence, and any documentation pertaining to financial, insurance, or tax matters.
- The digital archiving process must follow Company guidelines and is carried out with the support of the designated responsible personnel.

## LEAVES

- Employees are entitled to annual leave in accordance with applicable labor laws. The scheduling and number of leave days are determined by the Company based on departmental needs and in alignment with legal requirements, while also considering employees' preferences.
- The annual leave schedule is subject to change in cases of emergency or force majeure. Before starting leave, each employee must inform their direct supervisor and colleagues and ensure that their responsibilities are delegated or managed during their absence.
- Annual leave days must be used by the end of the calendar year, in accordance with applicable legislation.
- All other types of leave provided for by law (e.g., marriage, maternity, parental leave) will be granted in accordance with the relevant regulations.
- Absences due to illness must be reported to the Company and to the employee's supervisor by the official starting time. A valid medical certificate from a public health institution or a private doctor must accompany the absence.
- Compensation and employee benefits during periods of illness are governed by applicable labor laws and social insurance regulations.
- Educational leave—whether paid or unpaid—may be granted with the prior approval of the Board of Directors or the General Manager.

## DRESS CODE

- Employees must maintain a neat, professional appearance during working hours, both within the Company and at external work locations.
- The Company's dress code policy aims to promote a reliable and professional image to clients and business partners.
- This guideline is not intended to restrict individual expression or personal taste, but rather to reflect the seriousness and integrity of the profession.

## NON-SMOKING REGULATION

- The Company enforces a strict non-smoking policy in accordance with workplace safety and public health regulations.
- Smoking is strictly prohibited in all Company facilities and client premises.
- The only exception is the designated outdoor smoking area, which may be used only during authorized break periods.



## COFFEE AND LUNCH BREAK

- Each employee is entitled to a daily break of thirty (30) minutes during working hours.
- This break must always be taken in a manner that respects the needs of the Company and its clients.

## ASSESSMENT OF PERSONNEL

- An annual performance evaluation is conducted for each employee. This evaluation includes measurable and qualitative criteria such as: Knowledge, Diligence, Communication, Collaboration, Professional attitude, Progress and development, Competence in fulfilling assigned duties.
- The evaluation is completed jointly by the Company, the employee's manager, and the employee. A copy is retained by the designated responsible party.
- In addition to the annual evaluation, informal assessments may take place during day-to-day operations to address urgent or recurring performance issues. These evaluations help form an ongoing view of the employee's strengths and areas for improvement. Employees will be informed of such assessments and their outcomes.
- If an error occurs due to an employee's action—whether intentional or unintentional—they are required to complete an Error Reporting Form. This document must describe the issue, its causes, corrective measures, and steps to prevent recurrence. These forms will be considered during the formal evaluation process.

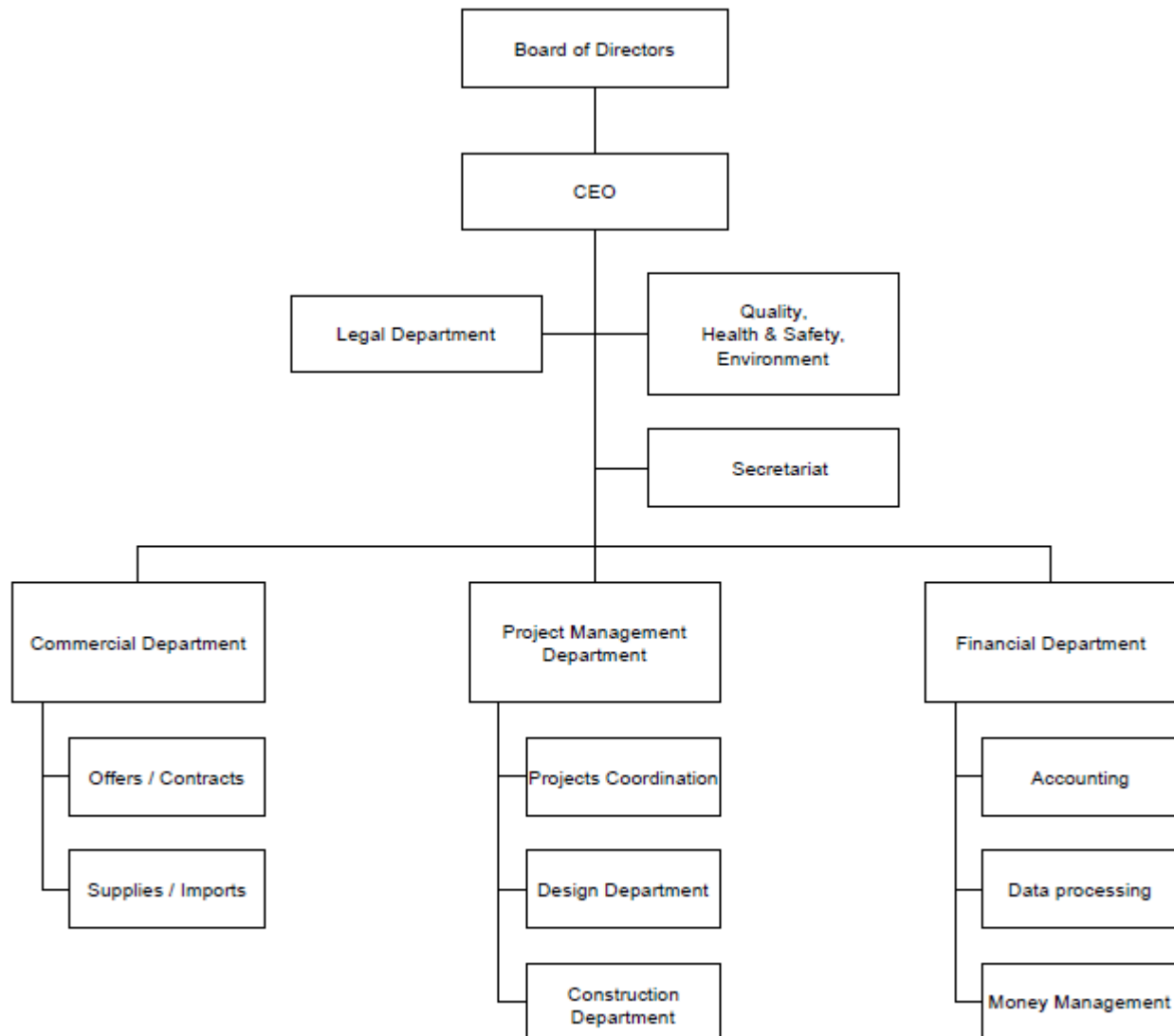
## TERMINATION OF EMPLOYMENT CONTRACT

- The employment contract is automatically terminated upon the expiration of the agreed term or the completion of the agreed service.
- For indefinite-term contracts, either party may terminate the employment relationship in accordance with applicable labor laws and relevant procedures.
- Nothing in this Regulation shall be construed as limiting the Company's legal right to terminate any employment contract as provided by law.
- Upon termination, the employee is required to return all materials and equipment provided by the Company, in accordance with the terms of their contract.
- On the final working day, the employee must visit the Company's offices to receive and complete the "Clearance Form," which outlines the steps and departmental approvals required prior to departure. Once signed by all responsible parties, the completed form must be submitted to the Company's Accounting Department.



## ORGANIZATION CHART

- The Company maintains an up-to-date Organization Chart, which outlines its internal structure, reporting lines, and departmental responsibilities. This chart is available to all employees and is subject to change based on operational needs, by decision of the Company's management







## FINAL PROVISIONS

- Failure to enforce any provision of this Regulation shall not be interpreted as a waiver of the Company's rights.
- Compliance with this Regulation is mandatory for all employees and is monitored and directed by the Company.
- Nothing in this document shall be interpreted as restricting the Company's right to manage its workforce within the bounds of applicable legislation.
- The Company retains the exclusive right to:
  - Determine the number of employees required
  - Select, assign, and promote personnel
  - Apply disciplinary measures
  - Establish internal policies and duties
  - Regulate employee conduct in the workplace
- This Regulation, along with any future amendments, enters into force immediately upon approval and communication to employees.