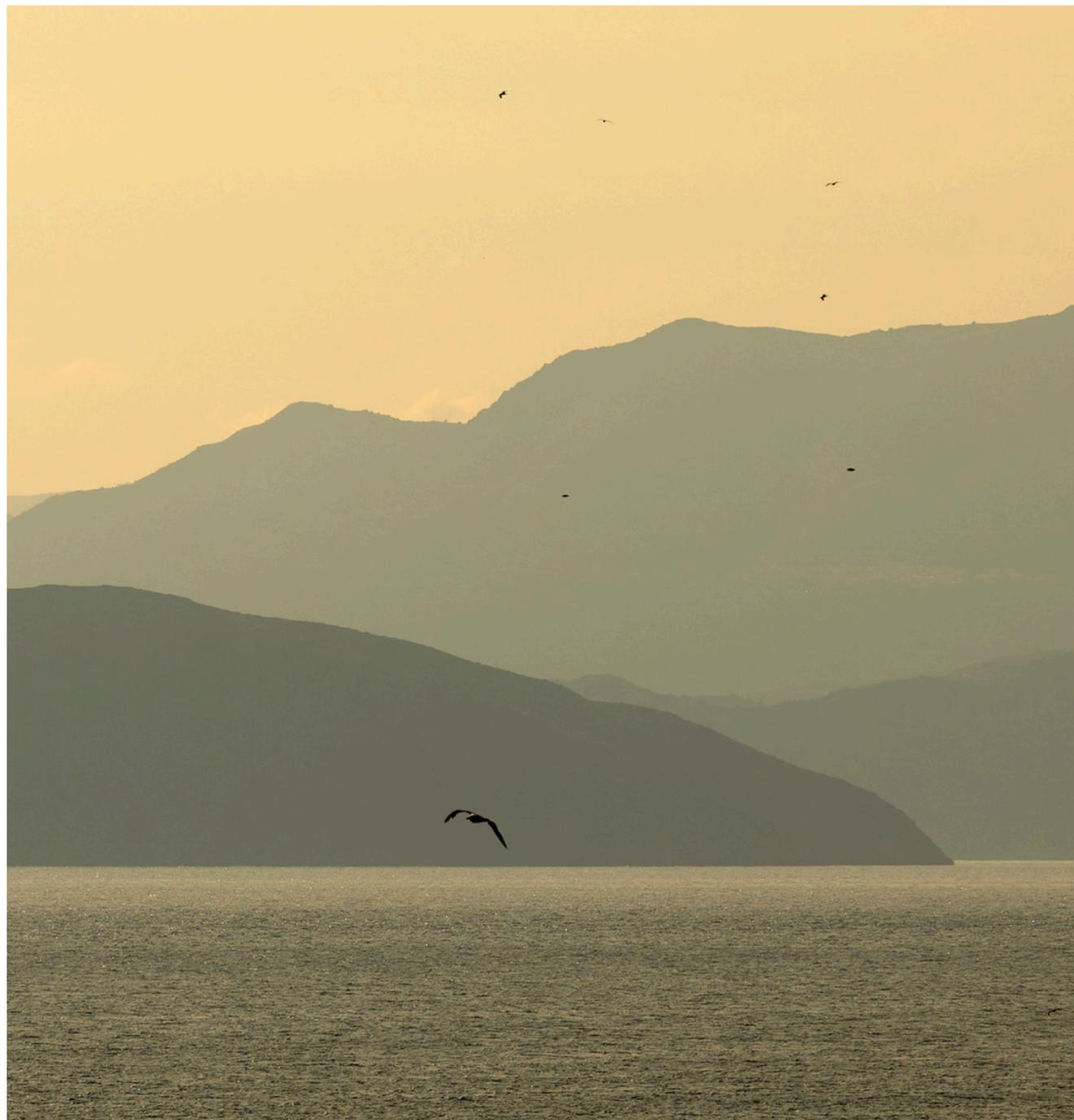




# Code of Conduct & Ethics



Building a more sustainable future is at the heart of our company's vision. We strive to inspire future generations, as this commitment is deeply embedded in our DNA.

We are dedicated to operating with integrity and respect toward all our stakeholders, fostering and demonstrating ethical conduct both internally and externally, always in full compliance with regulatory frameworks.

Our Values in Action, Every Day.

The Bluegr Code of Conduct and Ethics sets the standard for ethical behavior across all our operations. It serves as a fundamental guide for our employees and business partners, ensuring that our commitment to excellence and responsibility is upheld at every level.

At Bluegr, regardless of role or position, every individual is expected to act with integrity, demonstrating exemplary conduct and full compliance with all applicable laws and regulations.

*The Code of Ethics and Conduct applies to all stakeholders, employees, and partners of Bluegr.*

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At Bluegr, our foundations are built on strong ethical principles and core values such as Ethos, Integrity, Responsibility, and Justice. These values have played a defining role in our long lasting success, fully reflecting our commitment to exceptional hospitality and sustainable growth, as well as our vision to lead and inspire future generations through our experience.

We evolve and improve by embracing the wisdom of the Stoics: “If we are what we repeatedly do, excellence then is not an act, but a habit.” With our Code of Ethics and Conduct at the heart of our operations, we pursue Excellence as a way of life.

At Bluegr, doing business with integrity is a fundamental value and the cornerstone of our ethical compliance program. We understand that how we achieve success is just as important as success itself, and this awareness reinforces our commitment to operating with the highest level of integrity. As strong advocates of sustainable growth, we work tirelessly to meet the needs of today while fostering long-term relationships with all our partners. I encourage every employee to become familiar with the Code—it is a valuable guide to acting with integrity at all times.

The Bluegr Code of Ethics and Conduct defines a model of exemplary behavior that permeates every aspect of our operations. It is an essential tool on our journey toward Excellence, and as such, it is crucial that we understand it and allow it to guide our daily actions. By doing so, every member of our team becomes a champion of our values and principles, responsible for acting with integrity, treating others with dignity and respect, and being honest and fair in all dealings.

As a family business, we lead by example and never stop looking to the future. Passing down our legacy and family values from generation to generation is the most important indicator of our success. As an aspiring holistic leader and mother, I hope to pass the torch to the next generation with humility and sincerity.

Each of us shapes our own path. Together, we create spaces inspired by our heritage and driven by our vision for the future—always guided by the fundamental values that define us. With deep expertise in hospitality, we are honored to invite you to experience these values firsthand.

Gina Mamidaki  
CEO, Bluegr Hotels & Resorts



## OUR MISSION

To delight our guests with personalized experiences in a sustainable, authentic, and warm environment

## OUR VISION

To provide hospitality excellence, strive for sustainable growth, care for our people and communities, and inspire generations to come

## OUR VALUES

Prudence, Magnanimity, Ethos, Passion, Bravery, Justice, Integrity, Accountability, Modesty

## INTRODUCTION

### **The Code of Conduct is our general statement on Ethical Business Behavior.**

Our Code of Conduct and Ethics outlines Bluegr's standards for ethical business conduct, based on our commitment to uphold Bluegr's values and comply with the law.

### **At Bluegr, our Business Principles are as follows:**

#### *We Do Business Honestly*

We operate with integrity, respecting one another with dignity at all times. We take responsibility for the impact of our actions and decisions, relying on mutual trust to make the right choices.

#### *We Do Business Together*

We work together, collaborating as a team to fully harness our potential. We build lasting partnerships and productive relationships, while contributing to the enrichment of the communities where we operate.

#### *We Do Business with Passion*

We have the creativity, commitment, and confidence to drive change.

#### *We Do Business to Grow*

We operate with growth in mind, thinking creatively and taking smart risks, while rewarding innovation in all aspects of our business. We are committed to delivering exceptional quality and surpassing our goals. Our Statement of Values reflects the unwavering integrity with which we operate, while the Code of Conduct outlines our responsibilities. All guidelines align with high standards of ethical conduct, and the company expects full compliance with the Code of Conduct, Corporate Policies, and the laws governing our operations.

### **Who Does the Code Apply To?**

The Code of Conduct applies to all Bluegr employees, including temporary, part-time, and seasonal workers. Certain provisions of the Code of Conduct may also apply to members of Bluegr's Board of Directors ("Board Members") in their capacity as such.

### **Managers have additional responsibilities**

Managers and supervisors must foster an environment of ethical behavior by:

- Leading by example, demonstrating ethical conduct in the performance of their duties.
- Ensuring that employees understand that business results are never more important than compliance with ethical standards.
- Ensuring that employees are aware of the ethical standards in the Code and the Corporate Policies that relate to the performance of their duties.
- Encouraging open communication on business practices and ethical issues.
- Taking action to address instances of unethical behavior, including providing training, advice, and, where necessary, taking disciplinary actions.
- Recognizing and rewarding ethical behavior.

### **What are the consequences of unethical behavior?**

Unethical actions and violations of the Code of Conduct and Corporate Policies can negatively impact Bluegr's business activities and reputation, as well as have serious consequences for all parties involved with Bluegr, such as employees, shareholders, customers, and partners.

Whenever Bluegr becomes aware of a violation of the Code of Conduct, Corporate Policy, or the law, it will take action to address the issue and prevent future occurrences. Depending on the circumstances, corrective and preventive measures may include training, advice, and disciplinary actions, including termination of employment and legal action in civil and criminal courts.

If you find yourself in a situation that you believe may constitute a violation or lead to a violation of the Code of Conduct, Corporate Policies, or the law, you are obligated to speak up.

### **Where to seek guidance and report concerns**

Employees who have questions about the Code of Conduct, Corporate Policies, or behavior that may violate these standards can seek assistance from the following sources:

- Supervisors are available to answer questions and are familiar with the corporate guidelines that apply to business activities in their areas.
- Human Resources representatives are the best source for any questions regarding employment and workplace benefits.

All issues and concerns will be handled fairly and discreetly, and retaliation against an employee who reports an ethical issue is strictly prohibited. For procedures related to reporting concerns regarding accounting and auditing issues, please refer to the section "Seeking Help and Reporting Concerns."

## CONFLICT OF INTEREST

A conflict of interest occurs whenever personal interests might affect our judgment about what is in the best interest of Bluegr or hinder our ability to carry out our duties objectively and effectively.

Employees and Board Members must act in the best interest of Bluegr without considering personal interests or potential personal gain.

It is crucial to address the appearance of conflicts of interest, as a perceived conflict can be just as damaging to Bluegr's reputation as a real one. Employees responsible for the procurement of goods and services should be particularly mindful of potential conflicts of interest.

If you ever perceive a potential conflict of interest, you should notify your supervisor or the Human Resources representative, as these individuals can help you determine whether there is an actual, potential, or perceived conflict of interest.

### **Common Situations**

It is not possible to list every situation that might cause a conflict of interest. Some common situations involve relationships, financial investments, and secondary employment.

### **Family members and close personal relationships**

Work situations that involve family members or employees with close personal relationships may create a real, potential, or perceived conflict of interest and could result in a negative or unprofessional work environment. As a result, an individual may not be hired or promoted to a position where they would report directly or indirectly to a family member or someone with whom they have a close personal relationship.

*Who is considered a family member?*

- A family member includes all relatives by blood, marriage, or adoption.

*What is considered a close personal relationship?*

- A partner of any gender, anyone living with an employee, close friends, and individuals in a romantic relationship.

Positions and duties will be assigned based on qualifications, skills, and achievements, not on personal or family relationships. If a family or personal relationship between employees could present a real, potential, or perceived conflict of interest, Human Resources representatives and Supervisors should be informed.

### **Business gifts and entertainment**

Business gifts and entertainment are useful tools for strengthening business relationships. However, we should neither offer nor accept gifts, favors, or entertainment if doing so could create an obligation or appear to do so.

We should not request or seek personal gifts, favors, entertainment, or services. Additionally, we must not use our position at Bluegr to request personal preferential treatment from suppliers, such as special prices, terms, or loans.

#### *Gifts*

When considering the acceptance or offering of a gift, we must use prudent judgment and moderation.

#### *Acceptance of Gifts*

In general, we should not accept gifts from partners or competitors. We may accept small gifts. Gifts of significant value should be returned to the sender with an explanatory letter.

Employees are not allowed to accept gifts in cash or equivalents (such as checks, bonds, stocks, or other corporate securities) of any value. Gift cards and vouchers that allow the recipient to choose from a wide range of products or services may be considered cash equivalents. Therefore, before accepting a gift card or voucher, employees should consult with a representative from the Human Resources department.

#### *Offering Gifts*

We should only offer gifts out of courtesy, if it is customary business practice, and if it is appropriate and reasonable for the occasion.

We must not offer gifts if we know that doing so would violate the policies of the recipient's employer.

Before offering gifts to government officials, we must always consult the Human Resources department.

#### *Entertainment*

We may accept or offer business entertainment and meals that are reasonable within the scope of business activities and promote the interests of the Company. For example, attending a local cultural event, a sports event, or a professional meal with a partner (such as a client or supplier).

## External activities

### *Secondary employment*

Bluegr expects full commitment from its employees in fulfilling their responsibilities. Any secondary employment or other obligations could interfere with this commitment.

Therefore, approval from the Human Resources department is required before

- accepting a secondary job,
- starting a business activity or personal profession,
- or agreeing to act as a consultant, executive, or board member in situations that could hinder our ability to perform our job duties or increase the likelihood of a conflict of interest.

The skills we acquire and use at Bluegr should not be used in ways that could be detrimental to the company's activities. Providing services in any capacity to an organization that competes with Bluegr in any way, or engaging in personal activities that compete with Bluegr, constitutes a real conflict of interest and is prohibited. Providing services in any capacity to Bluegr clients presents a high risk of conflict of interest and must be approved by the Human Resources department.

### *Investments*

Our personal investments should not influence, nor appear to influence, the business decisions we make on behalf of Bluegr.



## OUR RESPONSIBILITIES

### **Our Responsibility to each other**

#### *Respect and Diversity*

We must treat others as we would like to be treated—with respect, dignity, and integrity.

Everyone has the right to work in an environment free from discrimination and harassment based on:

- Race
- Color
- Religion
- Gender (including congenital or related conditions)
- Sexual orientation
- Gender identity
- National origin
- Personal background
- Social background
- Age
- Disability
- Family status
- Genetic information
- Status as a victim of armed conflict or
- Other protected characteristics

We must respect the rights of our colleagues and always bear in mind that there is zero tolerance for discrimination or harassment.

If the behavior of a colleague makes us or someone else uncomfortable, we must report it. We each have a responsibility to report any incidents of discrimination or harassment that we experience or observe to the Human Resources department.

As part of our business strategy for success, we strive for diversity in who we are and what we do, primarily through our people, perspectives, partners, and products.

We provide equal employment opportunities to all applicants and employees, without regard to the above characteristics. The hiring decisions we make are aimed at meeting our needs based on factors such as qualifications, skills, and achievements—always in compliance with national and local labor laws.

#### *Employee health and safety*

Bluegr has established safety programs to provide information and training on safe practices both during regular work activities and in emergency situations.

We are responsible for adhering to health and safety rules, taking necessary precautions, and reporting any unsafe or hazardous conditions to our supervisors.

To maintain high quality, productivity, and safety standards employees must be in good psychological and physical condition to work. The possession, purchase, sale, use, or presence under the influence of illegal drugs or involvement in any activities that create an unsafe work environment during work or while on company premises is strictly prohibited. Alcohol consumption is also strictly prohibited during work or while on the premises, unless it is part of an approved social event.

### **Our responsibility to clients**

#### *Service quality and safety*

Bluegr's reputation for service quality and safety is one of its most valuable assets. Our commitment to the quality and safety of our services is embedded in every step of the design process and is a key factor in the company's success.

If any employee has concerns regarding the safety or quality of a service, they must report it to Bluegr's Human Resources Department.

#### *Client personal information*

We respect the confidentiality of our clients' personal information, in compliance with all applicable privacy laws and regulations. We do not provide any private and sensitive personal data we obtain online or through any other means for any reason.

#### *Advertising and promotional activities*

The company's advertisements, promotional programs, contests, and any promotional activities must comply with all laws and uphold Bluegr's reputation for honesty and integrity.

We follow high standards of business integrity in our advertising and promotional activities. We do not provide inaccurate information or misleading details about Bluegr's services.

## OUR RESPONSIBILITIES

### Our Responsibility to Shareholders

#### *Protection of Bluegr's assets*

All Bluegr employees and Board Members share the responsibility of protecting Bluegr's assets (including tangible assets, financial data, intellectual property, and confidential information) from theft, loss, damage, misuse, or waste.

Employees who use company property, such as vehicles and technological equipment, should take the appropriate measures for their safe and proper use.

Company assets should not be used for illegal purposes, nor for personal gain (unless allowed under approved company compensation programs). Occasional personal use of company resources, such as phones, personal computers, and photocopiers, is allowed as long as it does not interfere with the employee's duties, is not done for financial gain, does not conflict with Bluegr's activities, and does not violate any Bluegr policies or applicable laws.

We must protect the security of Bluegr's computing systems and electronic data by allowing access only to authorized individuals and using appropriate passwords.

The use of company passwords is prohibited during employee leave or absence and, obviously, after the end of employment. In exceptional cases, if deemed absolutely necessary, special permission to use passwords may be granted by the direct supervisor and/or the HR Department Manager.

#### *Commitments and expenses*

Bluegr has policies that provide authorization and establish requirements for the review and approval of the company's commitments and expenses. These guidelines apply to all expenses (including capital expenditures) and to all contracts that commit Bluegr's resources and define business activities.

Examples of commitments under these guidelines:

- Licensing agreements
- Contracts with consultants, sales representatives, distributors, and suppliers
- Service agreements
- Leasing or sale of corporate assets

#### *Authorization to enter into contracts*

Only specially authorized executives of Bluegr are allowed to enter into contracts on behalf of Bluegr, and this authority must always be exercised in accordance with the guidelines. We are all responsible for knowing the guidelines, understanding the scope of our authority, and ensuring that we do not bind the company (even verbally) beyond our authority.

#### *Intellectual property and confidential information*

Bluegr's intellectual property is one of its most valuable assets.

Examples of intellectual property include:

- Trademarks
- Trade names
- Trade secrets
- Intellectual property rights
- Domain names

Improper use or reference to Bluegr's intellectual property, including in advertising, correspondence, and contracts, can damage Bluegr's rights to these assets. To protect Bluegr's rights, we must always follow the company's guidelines for the proper use of intellectual property.

Confidential information is any information about Bluegr's operations that has not been publicly disclosed by Bluegr. Examples of confidential information include:

- Revenue information
- Profit information and forecasts
- Information about potential acquisitions, divestitures, and investments
- Information about new services
- Personal details of employees
- Organizational procedures
- Marketing plans
- Design and development efforts
- Personal details of customers

Employees and Board Members must not discuss confidential information with individuals who are not obligated to maintain confidentiality, and must be cautious not to discuss confidential information in public spaces such as transportation, event venues, restaurants, elevators, etc.

Some confidential information constitutes trade secrets. Please refer to the Intellectual Property and Confidential Information Policy.

The theft or unauthorized use of Bluegr's intellectual property and confidential information could have a significant impact on Bluegr's operations. Therefore, protecting Bluegr's intellectual property and confidential information is one of the most important employment responsibilities at Bluegr. This obligation continues even after employment ends.

Bluegr respects the intellectual property and confidential information owned by others. We must protect third-party confidential information from theft, misuse, or unauthorized disclosure with the same care that we protect Bluegr's confidential information.

Books, records, and accounts must be maintained with reasonable detail, accurately reflect transactions and events, and comply with applicable legal and accounting requirements as well as Bluegr's internal control system. To fulfill our responsibility to make thoughtful decisions, we need honest and accurate recording and reporting of business information and transactions, including details related to quality, safety, personnel, and financial transactions and records.

For information regarding the processes for reporting concerns about accounting and auditing issues, please refer to the section "Seeking Help and Reporting Concerns."

#### *Business communications*

Communications (even those we may consider "private" or "personal") may become public, so all correspondence must be clear and accurate. We must avoid exaggerations, inappropriate language, derogatory remarks, and legal conclusions. These guidelines apply to all types of communication, including email.

#### *Record keeping*

We must follow Bluegr's Policies and procedures for record-keeping and also the instructions of authorized Legal Counsel for the retention of documents related to legal disputes or government investigations.

## **Our responsibility to our partners**

### *Collaboration with third parties*

Bluegr greatly benefits from developing partnerships with third parties who share our values. We build relationships with partners (suppliers, distributors, licensors, franchisees, joint venture partners, etc.) based on integrity, legal and ethical behavior, and mutual trust.

### *Honest transactions*

Employees and Board Members must engage in honest dealings with Bluegr's customers, suppliers, and employees. We must not exploit anyone unfairly through falsification, concealment, misuse of confidential information, misrepresentation of material facts, or any other practice that does not meet acceptable business standards of honesty.

Refer to the section "Our Responsibility for Fair Competition."

### *Procurement Practices*

All dealings with suppliers must be honest, ethical, and impartial. Bluegr's suppliers should be selected based on factors such as suitability, quality, price, and delivery capability.

Employees involved in the evaluation and selection of suppliers and service providers should avoid actions that suggest or imply that decisions are influenced by gifts, favors, or personal or family relationships.

## **Our responsibility for fair competition**

### *Gathering information about competitors*

Bluegr does not seek to obtain competitive information through illegal or unethical means, and we do not knowingly use information obtained in such a manner.

If an employee discovers that Bluegr possesses information that has been obtained illegally or unethically, such as information provided to us in violation of a confidentiality agreement, they must immediately inform their direct supervisor without sharing the information with other Bluegr employees.

#### *Fair Competition and Antitrust Legislation*

Bluegr aims to compete aggressively and fairly. To compete fairly, we must adhere to national and EU antitrust legislation and competition laws.

Antitrust legislation aims to prohibit agreements between companies that fix prices, divide markets, allocate customers, or otherwise hinder or destroy market forces.

For example, these laws may apply to:

- Agreements with customers regarding sales prices, promotions, and special offers, or
- Agreements with customers or agents that Bluegr will refuse to sell to other customers or limit the sale of certain categories of rooms or services to other customers.

#### **Our responsibility to our communities**

##### *Services for the community*

Bluegr's Cultural Programs improve the lives of residents and groups in need in many ways, including monetary and in-kind contributions, organized employee volunteer activities, and other programs managed by the George and Aristeia Mamidakis Foundation.

##### *Environment and sustainability*

Bluegr strives to protect the health and safety of its employees and minimize our environmental impact. We comply with environmental legislation while incorporating environmental standards and health and safety standards into our business activities to reduce risks, limit impact, and provide a safe working environment.

##### *Communication with the Media*

To ensure that any information provided to the public is accurate and consistent, employees should not speak to the media without prior proper authorization. If a media representative contacts an employee, they should refer them to the appropriate Company representative.

#### **Our responsibility to the Government and compliance with legislation**

Employees and Board Members must comply with the laws, rules, and regulations of the country and regions where Bluegr operates.

Each employee is responsible for understanding the legislation and the Code as they apply to their work. If an employee has any doubts or concerns about the legality of an action, they should contact the Company's Human Resources Department.

## SEEKING HELP AND REPORTING CONCERNS

### General

If you encounter an ethical issue, ask yourself the following:

What is the ethical issue?

Start by identifying the problem—what in a situation makes you feel uncomfortable?

Is it a violation of the Code of Conduct, Bluegr's Corporate Policy, or the law?

If yes, do not proceed. If you are unsure, talk to your supervisor and the Human Resources department.

If you have any questions about the Code of Conduct, you should raise them.

The concerns raised will be addressed promptly, fairly, and discreetly. Employees must fully cooperate with any investigation that Bluegr may conduct and must truthfully answer any questions posed as part of the investigation.

### Zero tolerance for retaliation

There is zero tolerance for retaliation against any employee who in good faith raises an integrity or ethical issue. An employee who believes they are being retaliated against for raising a concern in good faith or assisting in an investigation in good faith must immediately report it to Human Resources.

### Further guidance

Because these guidelines are very general, it is possible that under certain exceptional circumstances, the Code of Conduct may not offer comprehensive guidance.. Prior to taking action that could possibly contradict the Code of Conduct, you should always seek advice and the approval of the Human Resources department.

### Reporting concerns about accounting and auditing issues

Any Bluegr employee may raise a concern in good-faith about accounting or auditing issues without fear of retaliation, through any of the following methods:

- Contacting their direct supervisor.

Employee reports submitted in writing or by phone can be confidential and anonymous. Due to technical limitations, submissions via email cannot be anonymous.

### Methods of reporting

Employees who wish to report concerns or who have a question regarding an ethical issue may refer to their immediate supervisor or the Human Resources department. These individuals possess the best understanding of your job position and the operations at your location and should be your primary source of information.

All reports are taken seriously; therefore, employees must act responsibly. Responsible reporting means the report is made in good faith. While it is not necessary to be completely certain of all the details, you must be honest when sharing what you know or expressing your concerns.

## OUR COMMITMENTS

Since 2016, we have supported the UN Global Compact (UNGC) network.

We embrace the 10 principles of the UNGC regarding human rights, labor, the environment, and the fight against corruption, reporting our activities in the annual Communication on Progress (COP).

We conduct our activities in alignment with a universal system of values, a holistic code of ethics that adheres to the 10 principles of the UN Global Compact.

We firmly believe that sustainability can only be achieved when all stakeholders agree to act ethically and uphold fundamental principles.

These principles are embedded in the daily business practices and activities of Bluegr. We promote a collaborative model of sustainable development and contribute to SDG 8 (decent work and economic growth).

Furthermore, since 2016, we have implemented the EFQM Excellence Model, a universal standard that emphasizes the role of the organization as a responsible member of the community, adopting an ethical approach as the best way to serve the long-term interests of stakeholder groups.



## OUR CORE BELIEFS

### STRONG FAMILY VALUES

As a family business, we pass down our legacy and family values from generation to generation

### EXCELLENCE

We are self-motivated and responsible

### BEAUTY AND SIMPLICITY

We love the beauty, elegance, and simplicity that exist in nature

### WILLPOWER, PASSION, AND COMMITMENT

We are driven by the strong force of will and always act with passion and dedication

### BE A CEO

We think and act as dynamic leaders, with determination and effective communication

### TECHNOLOGY, INNOVATION, AND CREATIVITY

We welcome surprises, encourage creativity, and embrace technological advancements

### WE ARE AMBITIOUS – NEVER GREEDY

### AUTHENTICITY

It's not enough to just travel, it's important to travel well

### WE INSPIRE EVERYONE TO LEARN, DREAM, ACT, AND EVOLVE

### EFFICIENCY AND EFFECTIVENESS

Focusing and prioritizing goals ensures success

### DELEGATION OF AUTHORITY, EMPOWERMENT & RECOGNITION

We encourage initiative and always give credit where it's due

### COMMON SENSE, CRITICAL THINKING, AND EMOTIONAL INTELLIGENCE

Our superpowers

### TEAMWORK AND ENTHUSIASM

Collaboration brings the perfect result

### NEVER SAY NEVER

Nothing is impossible

### RESILIENCE AND ADAPTABILITY

Success is a marathon, not a sprint

### LIFELONG LEARNING AND PERSONAL DEVELOPMENT

For continuous improvement

### ECONOMIC STRENGTH AND CONSISTENT RESULTS

For sustainable growth

### POSITIVE THINKING

We see every problem as a challenge



## OUR RESPONSIBILITIES TOWARDS:

### OUR CUSTOMERS

We are committed to providing excellent hospitality and exemplary, authentic experiences to our guests. We demonstrate our respect by offering impeccable services and the highest level of care, with Health and Safety as our top priority. We strive for improvement and monitor our performance through regular customer surveys, and our passion for what we do is reflected in our long-term value. Our B2B philosophy follows the same dynamic, delivering long-term value and tangible results.

### OUR SHAREHOLDERS AND OWNERS

We are committed to our shareholders, ensuring the Group's strong reputation and always acting in its best interest with transparency, integrity, reliability, and respect for its assets, including intellectual property. As Bluegr ambassadors, we operate responsibly under a set of values, standards, and mechanisms that ensure the safest possible transactions in all our activities.

### THE BOARD OF DIRECTORS / EXECUTIVE MANAGEMENT

We are dedicated to implementing corporate governance and the Group's strategy, recognizing that the Board of Directors and all executives play a crucial role in the sustainable growth of our business. We believe that board members and the executive committee lead the company effectively, driving the necessary momentum for continuous development.

### OUR PEOPLE

We aspire to be an employer of choice, making employee satisfaction our top priority. We strive to maintain a positive and supportive work environment where everyone is inspired and encouraged to take initiative, participate, grow, and act as CEOs/Ambassadors of the company. We provide opportunities that foster a motivating workplace culture.

We take pride in our strong family heritage and are committed to treating all employees equally. We provide a safe space for expression, where every opinion is heard and respected. We actively support and promote respect and equal treatment.

We have developed and implemented specific policies and protocols regarding the Health & Safety of all employees, ensuring well-being in a secure work environment and encouraging a healthy work-life balance.

We communicate and enforce GDPR regulations through training sessions and related policies.

We strive to cultivate a culture of teamwork and honesty through surveys and research. Our "Open Door" policy provides all employees with a safe space to discuss—completely confidentially—any work-related or career concerns. Our people can be assured that any issues they discuss with their respective supervisor will be handled with the utmost respect and discretion.

### OUR PARTNERS AND SUPPLIERS

Our company's relationships with partners and suppliers are characterized by honesty, consistency, transparency, trust, and fair treatment on both sides. Our suppliers are expected to comply with all relevant and applicable Greek laws and regulations. As a company with a strong ethical commitment, bluegr requires all its suppliers to ensure the health, safety, and well-being of their employees, to adhere to laws regarding child and forced labor, to adopt non-discriminatory employment practices, and to respect labor regulations.

### SOCIETY AND LOCAL COMMUNITIES

We recognize our responsibility to conduct business in a way that protects and strengthens the communities in which we live and work.

Community engagement is an integral part of our mission, and we encourage our employees to be active citizens, participating in solidarity and volunteer initiatives.

We are the initiators of the "We do Local" certification system, which supports local production, the economy, and the workforce of Crete.

The G. & A. Mamidakis Foundation (est. 1993) supports and promotes contemporary art and culture, lifelong learning, and the transmission of knowledge to future generations. Our vision is to be a source of inspiration and a point of reference for artists and art enthusiasts. Based mainly in Crete and driven by our love for art and culture, we design, coordinate, and implement an ambitious annual program of initiatives and events. We aim to create and sustain a network of people from various cultural sectors, fostering ongoing development, mutual support, and future collaborations.

We identify and prevent any potentially harmful impacts of our activities on local communities. We establish mechanisms to monitor our environmental footprint and maintain an open dialogue with local stakeholders.

## OUR RESPONSIBILITIES TOWARDS:

### **LOCAL AUTHORITIES**

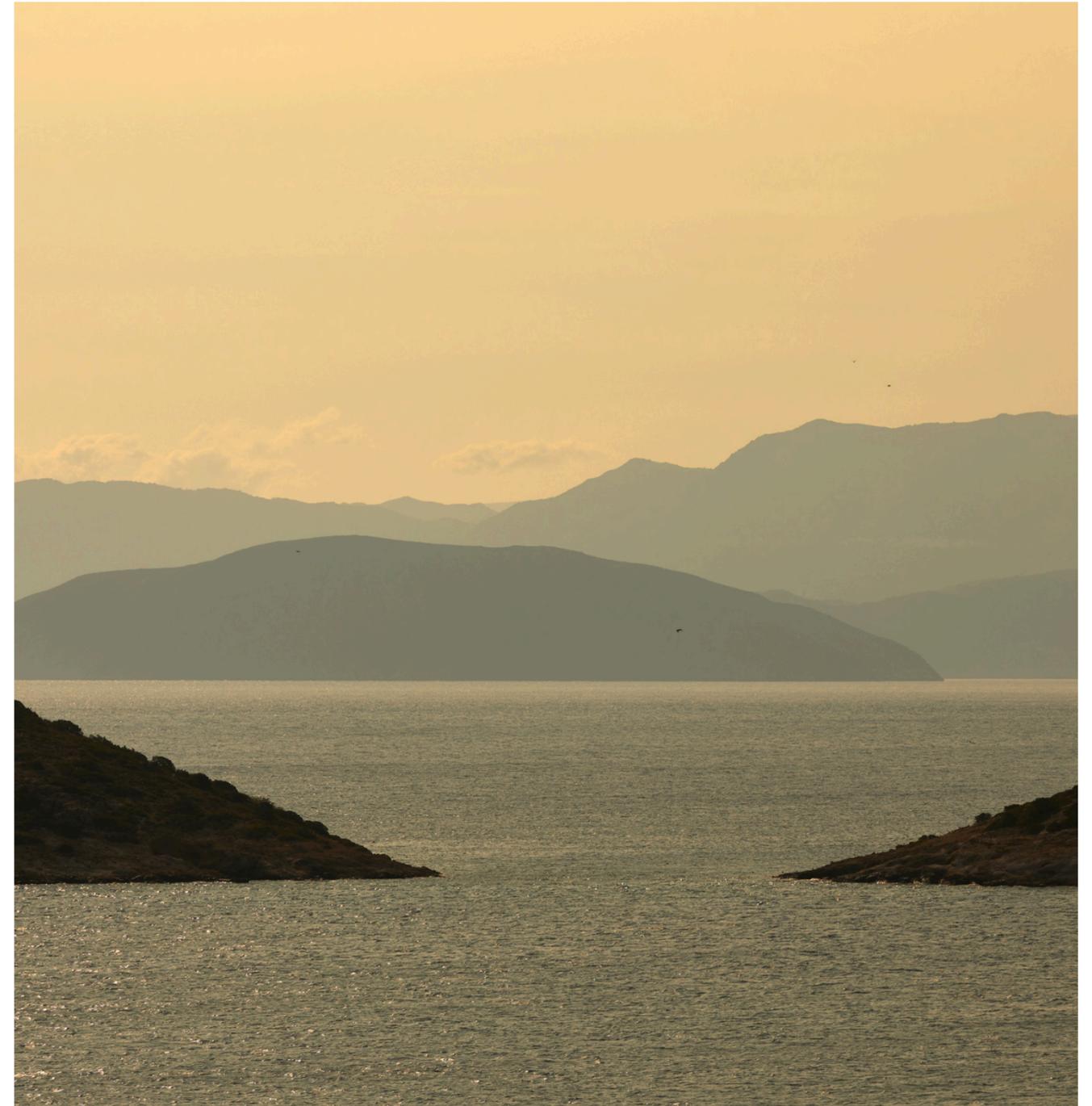
We follow the guidelines of local authorities and remain open to constructive dialogue to jointly strengthen local mechanisms and further initiatives for the benefit of the local community. We minimize the direct environmental impact of our operations while maximizing positive contributions and boosting economic and social development. Through Travel Life Certification, we can assess our sustainability progress and benchmark against other hospitality establishments, continuously identifying and pursuing best practices for improvement. We have developed policies that ensure this commitment, which we systematically evaluate through a risk management and assessment mechanism to take timely corrective actions when needed. We pave the way for socio-economic initiatives that drive progress and change.

We condemn all forms of harassment, violence, and discrimination and do not tolerate such behavior in any form or from any individual. Our priority is to create, establish, and maintain a workplace environment that respects, promotes, and safeguards human dignity and the right of every individual to work in an atmosphere of respect and solidarity.

We ensure that our employees are appropriately informed about their rights, the concepts of harassment and violence, the company's responsibilities in case of a prohibited incident, and the procedures to follow. The investigation and examination of complaints are always conducted with impartiality and confidentiality.

We promote appropriate behavioral standards based on our principles, values, and corporate culture, encouraging the reporting of unwanted behaviors to facilitate the timely resolution of all concerns.

For more information on Violence, Harassment, and Discrimination issues, please refer to our corporate Policy Against Violence and Harassment.



## SUPPLIER CODE OF CONDUCT AND ETHICS

1. The Bluegr Supplier Code of Ethics and Conduct (hereinafter referred to as the “Code”) outlines the minimum requirements and standards that Bluegr expects from its suppliers (supply chain) regarding food, beverages, materials, and other products and services.
2. The Code applies to all Bluegr suppliers (with minimal exceptions where necessary, such as occasional purchases) and their employees who have a direct and/or indirect relationship with Bluegr suppliers.
3. Bluegr’s relationship with its suppliers is characterized by honesty, consistency, transparency, trust, and fair treatment for all.
4. Bluegr suppliers must comply with all applicable laws and regulations in Greece and any other countries in which they operate.
5. At the same time, Bluegr requires its suppliers to ensure workers’ rights, prohibit child and/or forced labor, adopt non-discriminatory labor practices, respect labor regulations, and provide a decent, safe, and healthy working environment.
6. Furthermore, Bluegr demands that suppliers uphold high standards of business ethics, reliability, integrity, and modesty while ensuring absolute transparency in all transactions, adhering to Bluegr’s zero-tolerance policy toward corruption.
7. No Bluegr employee shall accept, directly or indirectly, gifts or benefits (whether financial or in kind) from suppliers attempting to influence business decisions, in line with Bluegr’s zero-tolerance policy on bribery.
8. Supplier selection may include criteria such as supporting local suppliers, innovation, aesthetics, exceptional product and service quality, and long-term added value for Bluegr and its stakeholders.

9. Bluegr urges its suppliers to demonstrate social and environmental responsibility and to engage, whenever possible, in social and environmental awareness initiatives, especially in communities where Bluegr operates.
10. Bluegr encourages synergies between its suppliers as part of its B2B initiative, fostering discussions on proposals and potential collaborations based on mutual benefit for Bluegr, its suppliers, and its stakeholders.
11. The relevant documents of this Code, outlining the principles, standards, procedures, and guidelines that Bluegr adheres to in its procurement policy, are included in the following certifications: HACCP/ISO-22000, ISO-14001, and TRAVELIFE (TUI).
12. Violation of the principles of this Code by any Bluegr employee may result in their dismissal, while violations by a supplier may lead to the termination of the partnership.
13. Bluegr encourages its suppliers to monitor their own supply chain and adopt relevant codes of conduct for their suppliers.

If you are a member of the Bluegr family and become aware of any violation of laws or regulations, please report it immediately to your supervisor and/or the Human Resources Department.

If you are a supplier, you may contact the Procurement Manager, Ms. Tanya Hanikian, via email at [tanya@bluegr.com](mailto:tanya@bluegr.com) or by phone at +30 2155007706.

For general inquiries or further clarifications, please reach out to the Human Resources Department at +30 2155007721 or [hr@bluegr.com](mailto:hr@bluegr.com)



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