



## code of business conduct

**ALFA FROST S.A.<sup>®</sup>**

WHOLESALE DISTRIBUTORS OF COMMERCIAL  
REFRIGERATION & FOODSERVICE EQUIPMENT

### MESSAGE FROM THE PRESIDENT

Dear Colleagues:

ALFAFROST S.A. has a well-deserved reputation for its quality services and products in the field of food service equipment. Each of us can take pride in that reputation because it takes all of us working in concert to meet the expectations that are intrinsic in our missions. We must abide by numerous laws and regulations, as well as the accepted standards of our professions.

The ALFAFROST S.A. code of Conduct is designed to help employees understand the philosophy, policies and expectations of the enterprise. The current edition of the code includes ALFAFROST's guiding principles as well as the standards that express the practical application of those principles.

Now, more than ever, our continued success depends on collaboration, honesty, respect, and the trust of those with whom we work or serve.

Please join me in carefully reviewing this Code and adhering to the standards it outlines. Thank you.

Sincerely



**Sofia A. Haitaidou**

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### Introduction

In accordance with the recommendations and full compliance with all applicable laws the company adopts and implements this Code of Conduct. This Code is designed in order to describe the main principles and rules of the company, concerning management systems, working conditions, quality services and products.

The purpose of the code of conduct is to support a safe, positive and respectful environment and to communicate your expectations and policies. The code must be respected of all employees of the company respecting all the principles that are mentioned.

### Key Elements

1. Personal Responsibility
2. Compliance with the Law
3. Commitment to employees
4. Obligations of employees
5. Work environment
6. Relations with the Public

### **1. Personal Responsibility**

All employees must accept personal responsibility for compliance with the Code of Conduct. In particular, employees must:

- perform duties with honesty, care, diligence, professionalism, impartiality and integrity
- take the time to read and understand the Code of Ethics and Conduct and the implications of non-compliance
- not hold financial interests that conflict with the conscientious performance of duty
- not engage in financial transactions using non-public Government information or allow the improper use of such information to further any private interest
- not, unless an exception is provided for in the Code of Ethics and Conduct or any acts, laws, regulations, determinations or directions, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by, or whose

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interests may be substantially affected by the performance or non-performance of the employee's duties

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- observe all relevant acts, laws, regulations, determinations and lawful directions that relate to the performance of official duties and avoid any action creating even the appearance that they are violating any acts, laws, regulations, determinations or directions
- treat colleagues and members of the public professionally and with courtesy;
- act impartially and not give preferential treatment to any private organization or individual
- avoid waste and misuse of public resources
- put forth honest effort in the performance of their duties in compliance with all laws, policies, statutes, rules, regulations and in accordance with their Code of Ethics and Conduct
- not knowingly make unauthorized commitments or promises of any kind purporting to bind
- not disclose or use non-public information learned in the course of their official duties to benefit themselves or others
- not use public office for private gain
- protect and conserve Government property and not use it for other than authorized activities
- not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities
- disclose waste, fraud, abuse and corruption to appropriate authorities

## 2. Compliance with law

All employees must comply with the law.

Employees who commit offences involving, in particular, prohibited drugs, fraud, seeking or accepting bribes, illegal importation or exportation of goods, will be subject to disciplinary action and/or associated penalties applied as a result of criminal proceedings.

All employees are required to inform senior management as soon as they learn that they are the subject of criminal or possible criminal proceedings. On receipt of such information, senior management should decide whether the official can be retained on normal duty, moved to alternative duties or suspended from duty.

All employees must not use their official positions or relationships established in the course of their duty inappropriately to influence or interfere with action being contemplated by internal investigation employees or external law enforcement authorities.

## 3. Commitment to employees

Management targets to create and maintain working conditions that promotes mutual trust ensuring the continuous development of the Company's employees. The

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company provides equal opportunities and complies with all laws protecting the confidentiality of employee records.

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### 4. Obligations of employees

- **Compliance**

Every single employee should learn the regulations concerning the position and the work he performs. After having read the Company Code and if doubts exist the employee should seek assistance from the supervisor.

- **Conflict of interest**

All employees must ensure that personal or financial interests do not conflict with their ability to perform their official duties in an impartial manner. Also they should manage and declare any conflict between their personal and public duty. In case that conflicts of interest do arise, ensure they are managed in the public interest.

### 5. Work environment

- **General Principles**

All employees have the right to a healthy and safe workplace, free of discrimination and harassment, in which individual and organizational objectives can be met. A good working environment is one that:

- is fair and equitable;
- is safe and supportive;
- is free of alcohol and drugs;
- is free of harassment and discrimination;
- is respectful of individual differences and cultural diversity;
- provides honest performance feedback and development opportunities; and
- is supportive of staff participation in the decision-making process.

- **Fairness and Non-Discrimination**

A commitment to fairness and non-discrimination is central to maintaining Standards of equity, ethical conduct and accountability. All employees must take an active role in ensuring the work environment is free of discrimination and harassment of any kind, including sexual harassment.

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- **Health and Safety**

The Company provides a safe and healthy working environment by taking effective measures to prevent possible accidents and injuries caused by, related to, or occurring during labor by minimizing, to any possible extent, the causes of workplace hazards. We implement and abide by a clear set of rules and procedures related to health and safety in the workplace, emphasizing on the provision and use of personal protective equipment, access to clean sanitation establishments and access to drinking water.

- **Misuse of Alcohol or Drugs**

Employees shall not report for duty or remain on duty while under the influence of alcohol or any kind of drugs. Under no circumstances shall employees operate a company owned vehicle, whether on or off-duty, while under the influence of alcohol.

## 6. Relations with the Public

The public expects their dealings with employees to be conducted with integrity, courtesy, impartiality, honesty and professionalism. To ensure a high standard of service is maintained, all employees must observe high standards of honesty, impartiality, character and conduct to ensure the proper performance of ALFAFROST business and the continued trust and confidence of the public.

employees shall not engage in any discriminatory practices based on race, national or ethnic origin, religion, age, sexual orientation, disability or any other discriminatory practices.

### 6.1 Promotional Activities on Behalf of other Organizations or Businesses

It is essential for employees to maintain impartiality in their dealings with the public, including avoiding even the appearance of one party being favored over another. Employees shall not use or permit the use of their Government position or title, or any authority associated with their public office, in any manner that could be construed to imply that the employee's agency or Government sanctions or endorses his/her personal activities or those of another; or to endorse any product, service or enterprise. If employees are in doubt about the nature of such requests, then they must refer the matter to senior management.

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### 6.2. Disclosure of Name – Wearing of Name Badges

Under most circumstances, members of the public have the right to know with whom they are dealing. As such, all employees are expected to identify themselves in correspondence and on the telephone, as appropriate. In addition, employees who come into contact with the public during the course of their work should wear a nameplate or some uniquely identifying officially assigned number (i.e. badge number, credential number, etc.). The exception to this rule is when the wearing of a nameplate or badge may endanger the personal safety of the official, or when the wearing of a nameplate may compromise or hinder a covert operation.

### 6.3. Safety – Assault and Obstruction of an Official

Employees should always, as a priority, consider their own safety and the safety of their colleagues when undertaking their duties. If a situation arises where it would be wiser to withdraw and seek additional support from trained personnel, then employees should do so. In all cases, such action should be immediately reported to senior management as soon as it is safe to do so.

### 6.4. Dealings with the Business Community

The business community should have access to the ethical standards applied by and should ensure that their own practices do not pressure employees to depart from those standards. Any attempts by members of the business community to offer inducements or other benefits in exchange for favours or special treatment must be reported immediately to the appropriate senior official(s) or investigative unit of the department/agency.

## Summary

The public is entitled to expect all employees to be honest, impartial and professional. To maintain public confidence, it is therefore vitally important that employees maintain the highest standards of integrity and conduct.

To reinforce what was stated in the introduction to this Model Code, a key element in any integrity programme must be the development, issuance and ready application of a comprehensive Code of Ethics and Conduct which sets out, in very practical and clear terms, the standards of behavior expected of all employees.

To fully comply with the code, employees must:

- Perform duties with care, diligence, professionalism and integrity;
- Strive for the highest ethical standards;
- Behave at all times in a manner that enhances the reputation of
- Behave in a manner consistent with the Code of Ethics and Conduct;

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- Support and encourage others to comply with the Code of Ethics and Conduct;
- Report any behavior that is inconsistent with the Code of Ethics and Conduct

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In addition, **all supervisors and managers** have a particularly important role to play and must:

- Strictly adhere to the Code Conduct, thus leading by example;
- Ensure staff are familiar with the relevant legislation, required standards, and departmental

Procedures and instructions;

- Deal with employees fairly and in good faith;
- Apply the Code of Ethics and Conduct in an objective manner; and
- Take appropriate action when employees fail to adhere to the required standards or demonstrate behavior that appears to be inconsistent with the Code of Ethics and Conduct.

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