

Bodossaki Foundation

Code of Professional Conduct

Statement from the President

Our Goal and Our Commitment

Our vision is a society of equal opportunities, with possibilities and prospects for all.

Our values play a central role in the pursuit of this goal. They reflect the philosophy and convictions of our founder, Prodromos-Bodossakis Athanasiadis, and underpin the identity of our Foundation—shaping its distinctive culture and guiding the way we work. These values define who we are and distinguish us as committed actors in the area of public benefit.

Transparency, Accountability, and Integrity are the cornerstones of our values. They drive our efficiency and effectiveness while continuously inspiring our ongoing contribution to Greek society

Scope of the Code of Professional Conduct

The provisions of the Code of Professional Conduct apply to all individuals who work for or collaborate with the Bodossaki Foundation in any capacity, including, but not limited to:

- Members of the Foundation's Board of Directors
- Individuals working for the Foundation under any form of contract
- External collaborators, including independent contractors, representatives of suppliers, and members of Civil Society Organisations working in partnership with the Foundation

In essence, the Code applies to all individuals who are expected to uphold the integrity and reputation of the Foundation—whether through formal employment, representation, or any form of collaboration.

Accordingly, the Foundation expects all external partners, particularly its suppliers and other civil society organisations with whom it collaborates, to



ensure that their personnel—especially those who interact directly with the Foundation—adhere to the principles set out in this Code and to the specific policies of the Foundation.

Compliance with the Code of Professional Conduct is required not only of those carrying out official duties, but also in any context where an individual's actions or behaviour may be associated with the Foundation.

This Code of Professional Conduct serves as a core regulatory framework for the Bodossaki Foundation and complements the applicable legal and institutional framework. Its provisions may be further detailed or expanded through dedicated policies adopted by the Foundation's Board of Directors, in accordance with current legislation.

Finally, each of us bears responsibility for ensuring that those closely connected to us, whether in a professional or personal capacity, refrain from any behaviour that might compromise the interests and reputation of the Foundation.

The Code of Professional Conduct in brief:

A. Adhering to the principles of transparency and equality at all times and in all contexts

B. Promoting a culture of professional ethics

C. Protecting the Foundation's reputation and public image – Acting respectfully

D. Bodies responsible for monitoring the implementation of, and compliance with, the Code of Professional Conduct and individual Policies – Ethics Committee

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A. Adhering to the principles of transparency and equality at all times and in all contexts



i. Acting according to our values, consistently aligned with the objectives of the Foundation.

Transparency, Accountability, and Integrity should guide all decisions and actions taken in the service of the Foundation. We promote education, support healthcare, protect the environment, and strengthen civil society, ensuring that all efforts are carried out transparently. We remain accountable not only to those who support or benefit from the Foundation's work, but to society as a whole. It is essential to protect the reputation and credibility of the Bodossaki Foundation, both in Greece and abroad. We strive to foster a society of equal opportunities, with genuine potential and prospects for all, particularly for socially vulnerable groups. Additionally, we are committed to protecting the environment and creating the conditions for a resilient, dynamic civil society.

ii. Nurturing interpersonal relationships and protecting the human rights of every individual

The Foundation promotes cooperation, honesty, open communication, and equal opportunities, always respecting human dignity. People working for the Foundation should be guided by a sense of personal responsibility and clearly define, in culturally sensitive ways, the boundaries that govern interpersonal relationships between colleagues and collaborators.

We are obliged to foster an atmosphere of trust, showing respect for diversity, including age, race, gender identity, ethnicity, sexual orientation, religion, national origin, disability, and professional experience of every individual we collaborate with. In this context, we must refrain from any offence to personal dignity or any form of harassment against any individual.

B. Promoting a culture of professional ethics

All of our senior executives lead by example. The members of the Board of Directors and the Heads of the Foundation's Departments set the standard through their own actions, applying the provisions of the Code of Conduct and its related Policies with particular care and commitment. In addition, they are responsible for communicating, explaining, and instilling the Foundation's values and culture among their teams, ensuring that everyone working for or collaborating with the Foundation embraces and upholds the principles it stands for.

In particular, it is expected that staff will:

- Foster a culture of respect and open, sincere communication,



- Convey both the spirit and the letter of this Code, along with the Foundation's individual policies,
- Identify and clarify any potential risks relating to their area of responsibility,
- Engage with honesty and respect in all interactions with beneficiaries, colleagues, and partners, serving as role models in every communication,
- Respond promptly, consistently, and reliably to complaints, feedback, and observations from beneficiaries, partners, and employees.

i. Preventing conflicts of interest

We must remain vigilant in recognising, managing, and avoiding situations that involve conflicts of interest. Such a conflict may arise from either professional or personal activities, particularly when our actions or interests compromise the impartial and effective fulfillment of our responsibilities to the Foundation and to society.

Examples of potential conflicts of interest include situations in which a person working for or collaborating with the Foundation:

- stands to gain a personal financial or other benefit—or to avoid a financial loss—at the expense of a grantee,
- has a personal interest that diverges from that of the grantee regarding the outcome of a public-benefit service,
- has a financial or other incentive to prioritise the interests of another grantee or group of grantees over those of the grantee they are working with,
- is engaged in the same activity—or has a family member engaged in the same activity—as a grantee,
- receives or expects to receive compensation or a share of the public-benefit service—in the form of money, goods, or services—from someone other than the grantee, in connection with the service being provided.

These principles apply equally to relationships and transactions involving the Foundation's suppliers and external partners.

At the Foundation, proper, impartial, and exemplary management strengthens transparency, eliminates conflicts of interest, and upholds a high standard of constructive engagement with society.

Responsibility for monitoring, reporting, and assessing potential conflicts of interest lies with the Heads of Departments, under the oversight of the President of the Foundation. If there is any uncertainty about how to handle or evaluate a particular situation, it must be promptly reported to the relevant



Department Head, who will in turn escalate the matter to the President of the Foundation.

More detailed information regarding conflicts of interest can be found in the Foundation's Anti-Bribery Policy, implemented in accordance with ISO 37001:2016.

ii. Preventing corruption and bribery

The Foundation is firmly committed to upholding the highest standards of ethical conduct and maintains a zero-tolerance policy toward bribery and corruption. This commitment applies equally to every one of us.

As such, neither we nor our family members may accept valuable gifts, discounts, fees, or any other financial or non-financial advantages from individuals or entities that may benefit from or receive support from the Foundation in connection with the public-benefit services we provide, or intend to provide, or any related services. This prohibition also extends to any attempts to offer such gifts or benefits.

However, the acceptance of small, symbolic tokens exchanged as part of courteous interaction among Foundation staff, grant recipients, suppliers, or partners is not prohibited, provided that such gifts do not create any grounds for criticism or perceived impropriety, fall within the bounds of reasonable, socially and professionally acceptable courtesy, and are lawful and properly documented.

Gifts that exceed what is considered symbolic or customary must be declared by the recipient to their Department Head at the Foundation. In cases involving attempted gift-giving (excluding customary gestures), or whenever there is uncertainty about whether a gift from a grant recipient, supplier, or partner may be accepted, one is required to consult the Department Head, who will then refer the matter to the President of the Foundation for approval or rejection.

In the unlikely event that we become aware of an incident involving corruption or unethical behavior, we are required to report it in accordance with the Foundation's Anti-Bribery Policy, which is aligned with ISO 37001:2016. This ensures that such incidents are dealt with promptly and effectively. The Foundation, in turn, is committed to taking all reports seriously and to protecting any person working for or collaborating with the Foundation who submits such a report.



Further information on issues of bribery and corruption in general can be found in the Foundation's Anti-Bribery Policy, implemented in accordance with ISO 37001:2016.

iii. Participating responsibly in social, political, and voluntary activities

The Foundation encourages and values our responsible participation in volunteer and community-oriented activities, provided that such involvement does not interfere with the performance of our duties, compromise the Foundation's reputation, or create a conflict of interest with the Foundation or its beneficiaries.

As members of a public-benefit organisation, we are free to engage in socially beneficial and volunteer efforts without needing prior approval from the Foundation. However, we are expected to do so responsibly, ensuring that these activities do not adversely impact our professional responsibilities. Anyone working for or collaborating with the Foundation is encouraged to raise any concerns about the potential implications of such activities with their Department Head.

iv. Acting responsibly in professional activities outside the Foundation

When engaging in employment or other professional activities beyond the Foundation, we are expected to avoid any involvement that could give rise to a conflict of interest or compromise the Foundation's integrity and reputation in any way. It is equally important that external commitments do not affect our ability to fulfill our duties as set out in our employment contract with the Foundation.

Conflicts of interest can emerge from both professional and personal activities, especially when our actions or interests interfere—or may interfere—with the impartial and effective discharge of our responsibilities.

For instance, without the Foundation's prior approval, we may not:

- Acquire a significant interest in any external business or enterprise,
- Undertake obligations on behalf of an external business or enterprise,
- Engage in paid work, directly or indirectly, for our own benefit or on behalf of another individual or legal entity,
- Accept assignments—whether paid or unpaid—from companies involved in commercial, profit-making, or nonprofit activities,
- Hold board positions in public or private companies or nonprofit



organisations,

- Acquire significant financial or other interests in a supplier for the Foundation.

C. Protecting the Foundation's reputation and public image

We are expected to embody the values and reflect the ethos of the Foundation at every level, both within and beyond the workplace. In our professional and personal lives, we should represent the Foundation and all that it stands for. Any behaviour that contradicts its values and principles is considered unacceptable.

Maintaining confidentiality in all our communications

To safeguard the confidentiality of information shared between the Foundation's departments, we rely not only on individual discretion but also on the implementation of 'Chinese Walls' where appropriate. These safeguards, applied through both our information systems and the physical separation of departments and personnel, help prevent unauthorised information flow within and outside the Foundation.

Our commitment to confidentiality continues even after we leave the Foundation. We should refrain from discussing or disclosing any information related to its operations, including details concerning grantees, donors, and other stakeholders.

i. Respecting and caring for the Foundation's assets

The Foundation's assets cover a wide range of tangible and intangible resources. These include buildings and fixed equipment (such as machinery, computers, desks, cabinets, lockers, filing systems, and any tools used by staff in their daily work), as well as software, communication networks, donor, scholar, and grantee databases, supplier records, research studies, regulatory documents, files, consumables, and more.

All communication carried out using the Foundation's email addresses, networks, or digital workspaces is considered professional in nature. We are responsible for the careful and respectful use of these assets, ensuring their proper functioning and preservation to support the Foundation's activities.



It is important to remember that the Foundation's assets must not be used for personal gain. Any doubts or concerns about the appropriate use of these resources should be reported to the relevant Department Head or directly to the President of the Foundation.

ii. Ensuring a responsible and professional presence on social media

The Foundation recognises our right to participate in social media, maintain personal accounts, and express our views freely. However, we are expected to use social media responsibly and in accordance with relevant laws and regulations.

Key principles to keep in mind :

1. Do not disclose information related to the Foundation.

Protecting information is a top priority. We are obliged to safeguard confidential or internal content related to the Foundation's supporters, beneficiaries, strategy, staff, and collaborators. This includes documents circulating through internal channels, such as announcements, contracts, and similar materials.

2. Do not post or comment about the Foundation without authorisation.

Only designated representatives are permitted to speak on behalf of the Foundation. Any public statements we make must clearly reflect our personal views and not be associated with our role at the Foundation. Only authorised content should be posted on social media, and we must refrain from commenting on legal matters.

3. Ensure that the tone and content of communications are aligned with the values of the Foundation.

Online posts should be made responsibly, reflecting our awareness that they are publicly accessible and may have a lasting presence. Our audience, intellectual property rights, and the privacy of others should all be respected. Personal references, particularly to donors, grantees, or partners, must not be made without prior consent. Respect, integrity, and courtesy should guide our online behavior.



4. Obligations to the Foundation should be honoured. We are expected to follow the terms of our employment contract—especially those related to confidentiality, discretion, and representation—and to comply with this Code and its policies, even when using social media in a personal capacity.
5. Even when acting with the best intentions, we must take care to act responsibly. Any content related to the Foundation may unintentionally cause harm—to the organisation and to ourselves. When sharing content that concerns the Foundation, we contribute to shaping its public image and should therefore ensure that our digital presence supports its values and reputation.

Participation in social media must always be responsible: during work hours, it should be limited to official purposes, and outside work hours, it should be conducted with respect for human dignity and in a way that reflects our professional role and the Foundation's values.

iii. Protecting Personal Data

The Foundation is fully committed to complying with Regulation (EU) 2016/679 on the protection of personal data (General Data Protection Regulation – GDPR), Greek Law 4624/2019, the guidelines of the Hellenic Data Protection Authority (HDDPA), and applicable case law.

The GDPR, effective since 25 May 2018, governs the processing of any information relating to an identified or identifiable natural person.

For detailed guidance on the GDPR and the broader legal framework, staff are encouraged to contact the Foundation's Data Protection Officer (DPO) or Legal Department.

C. Acting respectfully

i. Supporting collaborative relationships and the open sharing of information, encouraging teamwork at all levels

Information related to others' work must be handled with particular care, within a framework that respects confidentiality, avoids conflicts of interest, and safeguards personal data. In doing so, effective collaboration between colleagues and departments is promoted, teamwork at all levels is strengthened,



and optimal performance is ensured, while preventing misunderstandings both internally and externally.

ii. Prioritising personal and collective safety and maintaining high standards of individual and collective hygiene

One of the Foundation's highest priorities—and a shared responsibility among all employees—is to ensure health and safety in the workplace. The Foundation's management therefore implements all necessary measures to prevent and address accidents and occupational illnesses. In turn, we are committed to contributing to these efforts by complying with and conscientiously following the relevant guidelines aimed at comprehensive protection. The Foundation attaches paramount importance to safety and hygiene at both personal and organisational levels.

D. Bodies responsible for monitoring the implementation of, and compliance with, the Code of Professional Conduct and individual Policies – Ethics Committee

1. The President of the Foundation and the Legal Department are responsible for the ongoing monitoring and supervision of the implementation of the Code of Professional Conduct and the Foundation's individual Policies. In this capacity, they are authorised to process personal data accessed through the Foundation's IT systems, email, and other channels, while ensuring an appropriate level of information security. Their role is to support and uphold the principles outlined in the Code and its associated Policies, and to protect the Foundation's interests, reputation, and integrity
2. To investigate and assess both named and anonymous reports of potential breaches of this Code and/or the Foundation's individual Policies, an **Ethics Committee** (hereinafter referred to as "**the Committee**") is established upon the approval of this Code. The Committee submits written recommendations to the Foundation's Board of Directors, Executive Committee, or any other competent body, depending on the Policy in question. These recommendations concern the reports under review and any appropriate measures to be taken. Reports are generally submitted in accordance with the **Foundation's Whistleblowing Policy**.



3. The Ethics Committee is composed of three members and is considered quorate when all three are present. It aims to reach decisions by consensus; if consensus cannot be achieved, decisions are made by simple majority, with any dissenting opinions duly recorded. The Committee is made up of the following ex officio members:
 - The current Advisor of the Property and Financial Management Department
 - The current Head of the Legal Department
 - The current Head of Administrative Support/Secretariat of the Foundation
4. The alternate member of the Committee is the current Head of Digital Infrastructure Transformation, who replaces any Committee member in the event of a conflict of interest, suspicion of bias, or any other reason preventing their participation.
5. Should the Committee be unable to convene, the matter shall be decided by the President of the Board of Directors, or otherwise by the Board itself.
6. In the course of its duties, the Committee is authorised to process personal data accessible via the Foundation's IT systems, email, and other channels, applying appropriate technical and organisational measures to ensure an adequate level of information security. The purpose of this processing is to support and uphold the Code of Professional Conduct and the Foundation's Policies, and to protect its interests, reputation, and credibility.
7. If named or anonymous complaints relate to conduct allegedly breaching the Code or individual Policies, within the framework of a specific programme implemented by the Foundation—either independently or jointly with other bodies—and where that programme includes a dedicated body or committee (distinct from the Ethics Committee) for investigating such matters, both the Committee and the relevant programme body retain the authority to investigate, assess, and decide on such cases independently and without interference. Neither body's findings or decisions serve as precedent for the other. Nonetheless, where appropriate, the Committee and the programme-specific body may cooperate to enhance the effectiveness and efficiency of investigations, while preserving their independence.



8. The Board of Directors and/or the Executive Committee generally hold final decision-making authority concerning submitted reports. As previously noted, in certain cases decision-making powers may also lie with specialist committees established under specific rules and procedures governing Foundation programmes, whether conducted independently or in partnership with third parties.
9. If a case involves a potential breach of the Code or of a Policy by a member of the Board of Directors, the Board itself is solely responsible for the investigation and decision, excluding the member concerned. The responsible officer receiving the complaint must promptly forward it to the President of the Board, or otherwise to the Vice President or most senior Board member, as appropriate.
10. In exceptional circumstances, the President of the Board may refer a specific report or complaint directly to the Board for investigation or for handling by ad hoc committees it may appoint.
11. The Ethics Committee shall submit an annual report to the Board of Directors detailing its activities and, more broadly, summarising all reports or complaints of unethical conduct that have been processed or remain under consideration.

F. Validity and possible revision of the Code of Professional Conduct – Individual Policies

The Code of Professional Conduct is subject to regular re-evaluation and updating.

Responsibility for initiating its revision—and for expanding or clarifying its content through additional policies—rests with the President of the Foundation and the Legal Department. They are also tasked with taking the necessary steps to ensure that the Board of Directors approves any required amendments to the content and provisions of this Code and its associated Policies, particularly in response to changes in the applicable legal framework

This Code was approved during the 611th meeting of the Foundation's Board of Directors on **21** March 2025, and remains subject to ongoing evaluation regarding the effectiveness of its implementation.



The Foundation reserves the right to make additions and amendments to this Code within the framework and under the terms and conditions set out in the applicable legislation.

This Code enters into force from the date of signature by the **President of the Board of Directors** and will be made available on the Foundation's website in both Greek and English.

In the event of any discrepancy or inconsistency between the Greek and English versions, the Greek version shall prevail.

Athens, 21 March 2025

The President of the Board of Directors

Athina Dessypri