



**CODE OF
ETHICS**

AVIS

 **Budget**

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INTRODUCTION



AVIS BUDGET GREECE operates in its field with the goal of achieving customer excellence by offering services of high quality, while fully complying with the legislation governing every aspect of its activities. With a high sense of social responsibility, AVIS BUDGET GREECE strives to reduce its energy footprint, promoting the sustainable development of its fleet and making limited and efficient use of natural resources.

The Code of Ethics incorporates the values of AVIS BUDGET GREECE and constitutes the written statement/commitment of the Management towards its employees and any third party for the implementation of the Code's provisions.

AVIS BUDGET GREECE ensures that all its employees understand the Code of Ethics and are committed to implementing its provisions and encourages them to report any deviance that comes to their attention. The same is expected of all business partners of AVIS BUDGET GREECE.

In cases not provided for in the Code of Conduct, AVIS BUDGET GREECE undertakes to act in accordance with its fundamental moral values, always respecting human rights.

OUR VALUES



1.

Respect for human rights — Equal treatment

AVIS BUDGET GREECE respects human rights and embraces the uniqueness of each individual, adopting zero tolerance approach towards any kind of discrimination. Putting the moto “Our most important asset is our people” in action from day-one, AVIS BUDGET GREECE has managed to have in its manpower the most competent, experienced, motivated & devoted professionals.

In this context, AVIS BUDGET GREECE:

- / Provides equal opportunities for employment and professional development, based on each candidate’s competences, without discrimination on grounds of sex, age, racial or ethnic origin, religious or other beliefs, disability, or sexual orientation
- / Shows zero tolerance towards any kind of violence or harassment
- / Encourages employees to openly express their views and proposals, takes them into account and responds to them
- / Provides equal opportunities for education and vocational training for all its employees
- / Respects employees right to collective bargaining and to organize as a union
- / Rewards dedication, creativity and success applying fair and competitive remuneration policies, as well as holistic and objective evaluation processes
- / Ensures employees’ privacy during their work. It respects their personal data and ensures its safe processing
- / Does not tolerate child labor or any form of forced labor
- / Has placed Health, Safety and Wellbeing at Work as its top priority, providing safe, clean, and pleasant workplaces
- / Respects human rights and acts to protect them
- / Fosters a fair, transparent and cooperative working environment and encourages respect and solidarity among its employees



2.

Transparency, honesty, and fairness in relations with stakeholders

— Due diligence

AVIS BUDGET GREECE's relations with its stakeholders are governed by honesty and fairness.

AVIS BUDGET GREECE:

- / Fully complies with the applicable legislation and the relevant regulatory framework
- / Represents and nurtures the brand "AVIS-BUDGET" while preserving its reputation
- / Ensures that records of its economic activities and published financial reports are accurate and in accordance with the legislation and the applicable regulatory framework
- / Seeks honest feedback from stakeholders as a tool for improvement
- / Ensures that all its agreements are the result of negotiation in accordance with good faith and transactional ethics, comply with applicable laws and regulations and do not include vague, obscure, or abusive terms
- / Ensures that its employees behave in a professional and polite manner and refrain from providing misleading or incomplete information
- / Ensures the confidentiality of customers' personal data in accordance with the applicable legislation
- / Sets high standards when selecting its suppliers and representatives and raises the bar by demonstrating due diligence, throughout the cooperation, ensuring that they fulfil their legal obligations, are not involved in unethical or illegal activities, respect human rights and act in accordance with business ethics and anti-corruption principles



3.

Confidentiality

— Conflict of interest

AVIS BUDGET GREECE guarantees the confidentiality of the data exchanged within the context of each cooperation and ensures that any confidential information will be used solely within the agreed purpose.

All employees of AVIS BUDGET GREECE:

- / Are bound to respect the confidentiality of information that will come to their knowledge in the performance of their duties. Employees shall not disclose confidential information to unauthorized persons, within or outside the company, nor shall they use it, directly or indirectly, for personal gain
- / Are obliged to act in accordance with the duty of fidelity and refrain from any harmful action against AVIS BUDGET GREECE
- / Are expected to notify AVIS BUDGET GREECE in the case of a family or friendly relationship with a key employee of a customer or supplier
- / Do not abuse their position to gain an unfair advantage for themselves, or for a relative or a third party



4.

Dealing with bribery and corruption practices

AVIS BUDGET GREECE values integrity and transparency in all forms of business action and shows zero tolerance towards bribery and corruption practices.

The following apply regarding corporate gifts and sponsorships:

Gift & Entertainment Policy

All executives and employees (or their spouses and relatives up to the 2nd degree) of AVIS BUDGET GREECE must refrain from accepting, offering, or encouraging the provision/receipt of gifts or forms of entertainment from competitors, suppliers, customers or associates of the company except for gifts of symbolic value, exchanged in accordance with normal business practices, regarded as a manifestation of social decency or in the context of corporate public relations and as long as they do not conflict with the interests of the company.

Regardless of the amount, no cash or equivalent (e.g., gift vouchers) is allowed as gift.

Sponsorships

AVIS BUDGET GREECE may support charitable organisations or proceed to sponsor sports, cultural, educational, social, environmental, or other actions; all such donations are made in the context of the promotion of legitimate business interests and only for purely charitable purposes or in the context of social responsibility actions, without the expectation of any consideration in the form of an improper business advantage.



5. Protection of free competition

AVIS BUDGET GREECE recognises the importance of free competition and develops commercially within the framework of its legislation. By constantly renewing its fleet, maintaining its existing services at a high level, and introducing innovative proposals in the car rental or car acquisition sector, AVIS BUDGET GREECE maintains and improves its position in the market while operating reliably and fairly. AVIS BUDGET GREECE and its partner companies do not enter into agreements or concerted practices with third companies or companies within the sector with the aim of preventing, restricting, or distorting free competition.

Specifically, AVIS BUDGET GREECE:

- / Operates within the framework of healthy, free, and fair competition
- / Does not enter into agreements or engage in actions aimed at restricting competition, directly or indirectly, or are likely to lead to this result
- / Does not get involved into discussions or exchange of information with competitors with the aim of setting prices or harmonize market conditions



6.

Health & Safety at the Workplace

AVIS BUDGET GREECE is committed to providing a safe working environment that meets all hygiene requirements. Likewise, employees must keep their workplaces tidy and clean.

To ensure that its facilities constitute safe working environments, AVIS BUDGET GREECE:

- / Has prepared an Occupational Risk Assessment Study for each of its facilities. On a regular basis, it inspects the workplaces, with the collaboration of specialized Occupational Safety Officers and sees to their continuous improvement and the immediate repair of any damage
- / Collaborates with Occupational Physicians who, on pre-arranged dates, visit all facilities and keep individual medical records for each employee, to ensure their suitability for the type of work they perform. At the same time, employees can consult the Occupational Physician for any aggravating factors in the workplace
- / In the event of a work accident, informs the competent authorities immediately and cooperates with them during their investigation
- / Provides appropriate means of personal protection to its employees and trains them in their proper use; Supplies all its facilities with fully equipped first-aid kits, as required by law
- / Trains employees in Health and Safety policies and procedures; Employees are not allowed to keep in the workplace objects or materials that pose a threat to themselves, other workers, or the workplace itself or objects or materials that are illegal. Employees are also not allowed to keep alcohol, drugs or other addictive substances, or substances that impair mental or physical abilities, except for those prescribed by physician and are not allowed to perform any kind of work under the influence of such substances. Smoking in all forms (conventional cigarette, electronic etc.) is prohibited in all AVIS BUDGET GREECE premises

7.

Personal Data Protection

AVIS BUDGET GREECE acknowledges the importance of personal data protection and ensures their proper processing. To this scope, personal data are:

- / Collected and processed lawfully, strictly for specified, explicit and legitimate purposes or for compliance with legal and regulatory obligations or to defend AVIS BUDGET GREECE legitimate interests
- / Subject to lawful processing in accordance with the subjects' rights and only for the period required for the processing purpose or compliance with legal and regulatory obligations
- / Adequate, relevant, and limited to what is necessary in relation to the processing purposes
- / Safe from unauthorized access, loss, or destruction
- / Transmitted to third parties only if a sufficient level of protection is ensured

All the above are observed by all employees of AVIS BUDGET GREECE as well as by third parties who act as processors for AVIS BUDGET GREECE.



WHISTLEBLOWING POLICY



To ensure its immediate notification in cases of violation of provisions of EU Law and the Code of Ethics, AVIS BUDGET GREECE has launched internal reporting channels (Whistleblowing Policy). Through the internal channels, any person may, by name or anonymously, report a specific violation or express any concerns and then be informed about the status of their report.

Ways to submit reports:

- / **By phone** at any time and day by calling the number **8000000071**
- / Through the online reporting **platform** <https://secure.ethicspoint.eu/domain/media/en/gui/108227/report.html>
- / **By post** by sending a sealed **envelope** addressed to the Head of Internal Audit, to: Vas. Georgiou 50A, 15233 Chalandri, Greece
- / **Electronically** by sending a confidential or anonymous **email** to ethics@avis.gr

- / By informing the **National Transparency Authority** on kataggelies@aead.gr or on <https://aead.gr/submit-complaint/> website
AVIS BUDGET GREECE ensures an environment of trust that encourages efficient and unhindered channel operation.

AVIS BUDGET GREECE ensures an **environment of trust** that **encourages** the effective functioning of the Whistleblowing Policy.



