

CONEXTRANS S.A. Business Continuity Policy	Approval: Managing Director Version 1 Date 1/11/2014 Document No.: PRL-1
---	---

Conextrans I.F.F. SA

Business Continuity Policy

1. Introduction

Conextrans I.F.F. SA is committed to providing the best possible experience to its customers and the best possible relationships with employees, shareholders and suppliers. To ensure the consistent availability and delivery of its services, Conextrans I.F.F. SA has developed the following business continuity policy in support of a comprehensive program for BC and overall business survivability.

The Company, like any other firm, is exposed to potential risks that could disrupt or destroy critical business functions and/or the delivery of Company services. Our strategy for continuing business in the event of an incident is to ensure the safety and security of all employees; and to continue critical business functions and delivery of services.

2. Purpose and Scope

The purpose of the BC policy is to ensure that all Company business activities can be kept at normal or near-normal performance following an incident that has the potential to disrupt or destroy the Company.

The scope of this policy is the entire Company, its subsidiaries, offices and employees in Greece.

3. Statement of Policy

Each department in the Company is responsible for adhering to current and comprehensive business continuity plans (BCP) for its operations. Certain departments, such as Information Technology (IT), are also responsible for disaster recovery plans (DRP) to ensure that any damage or disruptions to critical assets can be quickly minimized and that these assets can be restored to normal or near-normal operation as quickly as possible.

When a plan is completed, approved and implemented, each plan will include procedures and support agreements which ensure on-time availability and delivery of required services. Each plan must be certified annually with the business continuity policy compliance process through the QA Manager.

Conextrans I.F.F. SA recognizes the importance of an active and fully supported BC program to ensure the safety, health and continued availability of employment of its employees and the delivery of quality services for customers and other stakeholders. Conextrans I.F.F. SA requires the commitment of each employee, department and vendor in support of the activities required to protect Company assets, mission and survivability.

4. Policy Leadership

CONEXTRANS S.A. Business Continuity Policy	Approval: Managing Director Version 1 Date 1/11/2014 Document code No.: PRL-1
---	--

Mrs. Smaro Moroviani is designated as the management liaison responsible for the BC program. Resolution of issues in the development of, or support of, all BC plans and associated activities should first be coordinated with Mrs. Moroviani and appropriate internal or external organizations before being submitted to the management. The issue resolution process is defined in the following section.

5. Verification of Policy Compliance

BC compliance verification is managed by the QA Manager with support from other relevant internal departments. Each plan must define appropriate procedures, staffing, tools and workplace planning activities necessary to meet compliance requirements. Plan templates have been developed to facilitate the plan development process, and these templates shall be used for all plans. Policy compliance verification activities are defined.

BC Compliance Verification is required annually and is facilitated by the QA Manager. Waivers for temporary compliance verification may be given if a detailed written waiver request issued by the department manager is approved by the QA Manager. Maximum delay for compliance is one year from the original date of compliance.

6. Penalties for Non-Compliance

In situations where a Company department does not comply with the BC policy, the QA Manager will prepare a brief stating the case for non-compliance and present it to the management for resolution. Failure to comply with BC policies within the allotted time for resolution may result in verbal reprimands, notes in personnel files, termination and other remedies as deemed appropriate.

7. Appendix A – Additional Policies

1. All department heads within Conextrans I.F.F. SA are responsible for business continuity (and, where appropriate, disaster recovery) for their area and are required to have a documented BC plan, signed by them.

2. The QA Manager acts as a BC coordinator to the departments and assists in the implementation and maintenance of BC plans, as well as readiness reporting for that department.

3. BC readiness within the Company must be reported on an annual basis to managements.

4. Deviations from this policy must be approved by the QA Manager. Policy compliance will be reviewed annually through internal audits.