



Head office Piraeus:

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Tel. +30 210 4124880 or +30 210 4122822 | Fax +30 210 4116781

e-mail: info@papadopoulos-sa.com

Branch office Thessaloniki:

120, K. Karamanli Ave | 570 08 Ionia | Greece
Tel. +30 2310 780808 | Tel./Fax +30 2310 784884
e-mail: thes@papadopoulos-sa.com
www.papadopoulos-sa.com

SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct is intended to ensure that our suppliers, project contractors, consultants and partners (the "Business Partners") embrace and promote the core values relating to ethical and sustainability principles.

J. & E. PAPADOPOULOS S.A. requires its Business Partners to comply with all the principles of this Supplier Code of Conduct and to promote these principles accordingly within their own supply chain.

Business Partners are expected to agree to an assessment of their performance on sustainability issues such as environmental, social and ethical issues that relate to either the Company's operations or those of third parties associated with the Company.

1. Business ethics and anti-corruption

Compliance

Business Partners are required to comply with all applicable local laws and regulations in all countries in which they operate. Business Partners shall have a formal system for establishing procedures and indicators, record keeping and taking corrective action in the event of legal violations or any breaches of this Code, approved by the Supplier's senior management. Business Partners may, at any time and upon request of I&E PAPADOPOULOS SA, disclose informative indicators and performance indicators on business activities, working conditions, safety and health, and environmental practices.

Business integrity

Business Partners are required to adhere to the highest standards of ethical conduct in every aspect of their business activities, including relationships, practices, procurement and operations, and not to engage in any form of corrupt practices, including, without limitation, extortion, fraud, bribery and money laundering.

Improper actions

Business Associates are required to avoid any conduct or action that would constitute a violation under the applicable corruption and bribery laws.

Business practices and competition

Business Partners are required to conduct their business in accordance with the applicable legal framework and regulations on competition, monopolies, and fair competition practices.

No unfair advantage

Business Associates shall not offer or accept bribes or other means of obtaining an improper or unfair advantage.



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2. Labour and Human Rights

Equal opportunities

Business Associates are required to provide equal opportunity and equal treatment, and not to discriminate in their hiring and employment practices based on race, colour, religion, gender, gender orientation, age, physical ability, health status, political opinions, nationality, social or ethnic origin, union membership, or marital status.

Child labour and forced labour

Business Partners are required to not accept and prohibit child labour. Business Partners are required to strictly comply with the legal working age limits applicable in the countries in which they operate.

J. & E. PAPADOPOULOS S.A. requires its Business Partners to reject all forms of forced or compulsory labour.

Harassment

Business Partners are required to treat employees with dignity, equality and respect, without harassment or discrimination.

Health and safety at work

Business Partners will ensure a healthy, safe and secure working environment for all their employees. Business Partners are required to maintain a health and safety incident reporting system accessible to all staff, and a system for investigating, monitoring and managing such reports. Business Associates are required to comply with all applicable safety and health laws and regulations, as well as implement corrective action plans to mitigate risks, provide necessary medical treatment and facilitate the return of employees to work.

Working hours, wages and benefits

Business Associates will comply with all applicable laws regarding working hours, wages and benefits. Overtime work will be paid in accordance with the corresponding applicable legislation.

Right of association and collective agreements

Business Associates are required to recognize and respect the right of employees to join or not join trade unions, associations or any other lawful organization, and to comply with all applicable local and national laws and regulations.

Minerals from war zones (conflict minerals)

Business Partners are required to take steps to avoid using materials (whether internally produced or sourced) that are considered conflict minerals. Upon request, Business Associates must provide information on the country of origin of the sourced materials.



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3. Environmental protection

Licences and authorisations

Business Associates are required to comply with all required environmental permits and approvals, and to comply with the operational and reporting requirements arising from such permits and approvals.

Pollution prevention, resource consumption and waste management

Business Partners are required to make continuous improvements in both environmental emissions and resource and energy management. Business Partners will implement and demonstrate appropriate measures to prevent pollution and minimise the generation of solid waste, wastewater and air emissions.

Greenhouse gas emissions and energy consumption

Business Partners should seek cost-effective methods to improve energy efficiency and minimise energy consumption and greenhouse gas emissions.

Restrictions on product content

Business Partners are required to comply with all applicable laws and regulations concerning the prohibition or restriction of specific substances, including labelling for recycling and disposal, e.g. REACH, Restriction of Hazardous Substances (RoHS), EC labelling, etc.

4. Protection of personal data

Business Partners are required to respect the protection of personal data and take appropriate measures in accordance with the provisions of the EU General Data Protection Regulation 679/2016 and the National Implementing Law 4624/2019. In order to harmonize with international standards and best practices, Business Partners should establish strict procedures for the protection of personal data throughout their activities.



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Declaration of Partner/Supplier

I, the undersigned, on behalf of declare that I have read and understand, the policies and principles, terms and conditions set forth in the Supplier Code of Conduct and confirm that the company adheres to and is committed to complying with this Code.

Company Name: _____

Signatory's name and title: _____

Signature and Stamp:

Date: _____

Validity of the Code of Conduct

J. & E. PAPADOPOULOS S.A. reserves the right to make reasonable changes to the requirements of this Supplier Code of Conduct resulting from relevant changes to the Code of Conduct and Business Ethics of J. & E. PAPADOPOULOS S.A. In this case, J. & E. PAPADOPOULOS S.A. will inform their own Business Partners and expect them to accept such reasonable changes.