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FIN-CD-1.0- 04/06/2019  
Suppliers / Business  
Partners Code of Conduct

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**June 2019**

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<b>TABLE OF APPROVALS FOR THE INITIAL VERSION OF THE CODE</b>	
<b>APPROVED BY</b>	<b>DATE</b>
Supplies & Logistics Director – Mr E. Tsakiris	28/02/2019
Corporate Governance Director – Mr Th. Economou	07/03/2019
Chief Financial Officer – Mr P. Dikaios	26/07/2019
Operations Steering Committee	04/06/2019

<b>LIST OF REVIEWS</b>				
<b>REVIEW</b>	<b>DATE</b>	<b>DESCRIPTION OF CHANGES</b>	<b>REVIEWED PAGES</b>	<b>APPROVAL</b>

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## 1. Introduction - Purpose

The Attica Group (hereinafter referred to as the "Group"), taking into account the fundamental principles and values that govern all its business activities, has set high standards of corporate responsibility regulating its relationship with the Society, the Environment and its Employees. Having adopted the Global Reporting Initiative Guidelines, as well as the ten globally accepted principles of Global Compact, the Group operates with a view to protect:

- human rights
- the environment
- labour conditions and
- the fight against corruption.

In this context and in order to ensure the existence and implementation of the principles of sustainable development within the Group's supply chain, it is necessary to specify the obligations of its Suppliers and Business Partners throughout its activity in Greece and abroad.

## 2. Commitment of Involved Parties

For the consistent fulfilment of its mission, the Group is committed to:

- Respect its agreements and maintain integrity in its business relationships with its Suppliers / Business Partners.
- Improve its business practices that emerge from its collaboration with Suppliers / Business Partners.
- Make a fair selection of Suppliers / Business Partners in the context of approved and documented procedures.
- Apply the current legislation.

The Suppliers / Business Partners of the Group are committed to:

- Act responsibly in all their business activities and comply in full with the current legislation.
- Defend human and labour rights.
- Provide a safe working environment.
- Abide by the environmental laws and regulations, for reducing the environmental impacts due to their activity.

## 3. Scope

This Code is valid and applies to Suppliers, Business Partners and all parties that are involved through them (contractors and/or subcontractors), to the extent of the parties involvement by virtue of this agreement.

## 4. Governing Principles

### Compliance with National and European Laws

Apart from the compliance indicated in this Code, the Supplier / Business Partner must comply with all applicable laws, regulations and contractual obligations set forth in the current National and European laws.

It is agreed that the "Suppliers / Business Partners Code of Conduct" is a fundamental contractual obligation throughout the cooperation.

The Suppliers / Business Partners shall apply this Code towards their third party collaborators who are involved in the business relationship between the Group and the Supplier / Business Partner.

### The Right to Organise and Collective Bargaining

Suppliers / Business Partners shall respect the right of their employees to organise, their desire to be included in trade unions and to communicate with their Management without the fear of retaliation, intimidation and any kind of harassment, pursuant to the current laws and regulations.

### Child labour

Child labour is strictly prohibited. The Supplier / Business Partner will hire no person younger than the minimum age of employment.

Suppliers / Business Partners must state their opposition to any practice that leads to child exploitation and must ensure that any condition, which may encourage this practice, is avoided or removed.

### Forced Labour

Suppliers / Business Partners must not perform any form of forced, obligatory or involuntary labour. In addition, they shall not require any financial guarantees, shall not withhold payments nor charge their employees as a condition of their employment.

### Working hours

Suppliers / Business Partners are required to observe the hours provided for in the collective agreements and laws for their employees, thus granting them the days of leave they are entitled to.

### Remuneration

Suppliers / Business Partners shall ensure the payment of fair and reasonable remuneration, as determined by the National Laws, as well as any legal or agreed benefit. Additionally, they shall inform their employees of the salary scale according to which they are being paid, shall ensure their timely payment and clearly specify the regime, under which said payments are made.

In addition, they shall not reduce salaries as a disciplinary measure.

### Fair Treatment, Diversity

Suppliers / Business Partners shall treat all their employees with respect and dignity and shall not engage in any form of verbal or other abuse, threats or intimidation. Moreover, they shall prohibit and fight against any form of discrimination on the basis of race, colour, gender, age, sexual orientation, language, religion, political or any other beliefs, national or social origin, and promote diversity and equal treatment at work.

### Health and Safety

Suppliers / Business Partners must provide their employees with a safe and healthy workplace and improve it when deemed necessary. Furthermore, they shall take all necessary precautionary measures to avoid risks, accidents and diseases, as well as provide adequate health and safety training. Should work equipment be provided, it must be given free of charge. The implementation of health and safety management systems during evaluation, pursuant to international standards, is encouraged and welcomed.

### Bribery, Fight against Corruption, Money Laundering

Suppliers / Business Partners is not involved in any form of bribery, unfair offerings or any payments to employees, customers, organisations, government officials or natural persons.

Moreover, they must dispose of corporate mechanisms to combat bribery or corruption, with zero tolerance, and ensure that their employees and third party collaborators are aware of the implementation of this policy.

In addition, they must take all measures to avoid – prevent money-laundering activities.

#### Sponsors

The sponsorships provided by Suppliers / Business Partners shall be in accordance with the applicable laws.

#### Donations to Political Parties

Suppliers / Business Partners do not donate to any political party.

#### Environment

It is encouraged and welcomed to voluntarily implement national and/or internationally recognised standards (e.g. environmental / energy management systems, such as the ISO 14001 or ISO 50001). Suppliers / Business Partners must act in accordance with the current laws, must minimise any environmental impacts due to their activity, and apply measures for the prevention of pollution. In addition, they must comply with all relevant laws and regulations and implement recycling, material reuse or replacement practices, where necessary.

The Group's sensitivity to environmental issues is of major importance, so Suppliers / Business Partners must be fully harmonised in this regard, with due regard for the protection of public health and safety.

#### Climate changes

Minimizing greenhouse gas (GHG) and carbon dioxide (CO<sub>2</sub>) emissions must be a priority for Supplier's / Business Partner's actions and we wish that they ensure that their environmental footprint is gradually reduced by implementing the current legislation.

#### Natural Resources and Waste Management

The improvement in the efficient use of natural resources (e.g. water, energy, raw materials) should be the responsibility of the Group's Suppliers / Business Partners. Furthermore, they shall implement the most efficient processes for the management of liquid and solid waste (e.g. recycling processes instead of shipment to landfills, etc.).

#### Data Security and Protection

Suppliers / Business Partners shall apply the current legal framework about data security and protection. Suppliers are required to safeguard the confidentiality of the information that is brought to their attention because of their relation with the Group. Suppliers shall respect intellectual property rights and confidentiality.

#### Competition

Suppliers / Business Partners must respect the rules of free and fair competition.

#### Quality of products and services

The Group places particular emphasis on the quality of the products and services offered. The Group ensures that all products and services provided by its Suppliers / Business Partners shall fulfil the requirements set forth by the law or the Group.

Voluntary implementation of quality management systems (e.g. ISO 9001) is encouraged and welcomed.

## **5. Monitoring - Reporting**

The violation of this Code is considered as a breach of the agreement between the Group and the Supplier/ Business Partner. Consequently:

- The Group reserves any legal right and legal relief in relation to any such action.
- In case violations of this Code are reported, the Group intervenes by setting timetables for corrective actions.
- The Suppliers / Business Partners of the Group are required to provide the relevant certificates or other official documents confirming their compliance with the above-mentioned principles of the Code, upon request.
- The compliance of Suppliers / Business Partners with this Code may be periodically reported, by recording any progress made.

## **6. Property of Document**

The Supplies & Logistics Division is the owner of this document and is responsible for reviewing this Code.

A current version of the Code is available on the Corporate Portal.

This Code was approved on 04/06/2019 and is issued in a controlled version.