

## SUPPLIER CODE OF CONDUCT

### Introduction

This Supplier Code of Conduct has the goal of ensuring that our suppliers, contractors, consultants and business associates (“**Business Partners**”) share and promote our fundamental values in ethics and sustainability principles. We require our Business Partners to comply with all the principles in this Supplier Code of Conduct and will correspondingly promote these principles within their own supply chain.

Business Partners are expected to agree to an assessment of their performance on sustainability issues such as their environmental, social, and ethical performance either performed by the Company or by third parties associated with the Company. The participation of Business Partners in the sustainability assessment is considered essential for the business relation with Epirus Metalworks S.A. as sound sustainability practices are expected from all of our Business Partners.

### 1. Business ethics and anti-corruption

#### Compliance

Business Partners are required to comply with all applicable local laws and regulations, including in all the countries in which they operate. Business Partners should have a formal system to establish rules and indicators, keep records and trigger corrective actions, in case of legal breaches or any violations of this Code, endorsed by senior management of the Supplier. Business Partners shall at any moment and upon request of Epirus Metalworks S.A., be able to disclose information and performance indicators on business activities, labour, health and safety and environmental practices.

#### Business integrity

Business Partners are required to adhere to the highest standard of ethical conduct in every aspect of their businesses, including relationships, practices, sourcing, and operations, and to not engage in any form of corrupt practices, including, but not limited to, extortion, fraud, bribery and money laundering.

#### Improper actions

Business Partners are required to avoid behavior or actions that would be an offense under any applicable laws relating to corruption and bribery.

#### Fair business and competition

Business Partners are required to conduct their business activities in accordance with all applicable antitrust, competition and fair-trade practice laws and regulations.

#### No improper advantage

Business Partners must not offer or accept bribes or other means of obtaining undue or improper advantage.

### 2. Labour and human rights

#### Equal opportunities

Business Partners are expected to provide equality of opportunity and treatment and not to apply any form of discrimination in hiring and employment practices on grounds of race, colour, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status.

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### Child and forced labour

Business Partners are required to prohibit child labour. Business Partners are required to employ only workers who meet the respective applicable minimum legal age requirement in the country of operation.

Epirus Metalworks S.A. require from their Business Partners to reject any form of forced or compulsory labour.

### Harassment

Business Partners are required to treat employees with dignity, equality and respect and are not harassed or discriminated against.

### Safe working conditions

Business Partners will ensure a healthy, safe and secure working environment for their employees. Business Partners are required to maintain a system for all personnel to report health and safety incidents, as well as a system to investigate, track, and manage such reports. Business Partners are required to comply with all applicable, health and safety laws and regulations and to implement, where necessary, corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

### Working hours, wages and benefits

Business Partners shall follow all applicable laws with respect to working hours, wages and benefits. Overtime shall be compensated at the prevailing overtime rates.

### Freedom of association and collective bargaining

Business Partners are expected to recognize and respect the right of employees to join or not join labour unions, associations or any other lawful organization and to comply with all relevant applicable local and national laws.

### Conflict minerals

Business Partners are expected to take measures to ensure that no minerals / raw materials are being used (manufactured or procured) which are considered conflict raw materials. Upon request, Business Partners shall provide country of origin information for the listed minerals.

## 3. Environmental protection

### Licenses and permissions

Business Partners are required to comply with all required environmental permits, approvals and registrations and to follow the operational and reporting requirements of such permits.

### Pollution prevention, resource consumption and waste management

Business Partners are expected to make continuous improvements with respect to environmental emissions as well as energy and resource management. Business Partners shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater and air emissions.

### Greenhouse Gas Emissions and Energy Consumption

Business Partners should look for cost effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

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### Product content restrictions

Business Partners are required to adhere to all applicable laws, regulations regarding prohibition or restriction of specific substances, including labeling for recycling and disposal, e.g. REACH regulation, RoHS restrictions, CE marking etc.

### 4. Personal data protection

Business Partners are required to respect the personal data protection and undertake the appropriate measures according to the provisions of the General Data Protection Regulation 679/2016 of the European Union and the national implementation law 4624/2019. Aiming the attunement with the international standards and best practices, Business Partners should establish strict procedures for the protection of personal data throughout its spectrum of activities.

### Supplier acknowledgement

I, the undersigned, acknowledge on behalf of the company ..... acknowledge to have read and understood the terms and conditions expressed in the Supplier Code of Conduct and confirm that the company adheres and commits to compliance with the Code

Company Name: \_\_\_\_\_

Signer's name and title: \_\_\_\_\_

Signature and stamp:

Date: \_\_\_\_\_

Approved by  
Periklis Sapountzis  
General Manager  
05/11/21

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