

**ETIL S.A.**

**Business Code  
of Conduct**

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## **A. Scope and application**

This Business Code of Conduct has been developed taking into consideration the interests of key stakeholders of ETIL S.A. and applies to all employees, officers, directors, contractors, and agents of the company, as well as all entities and subsidiaries controlled by the company. The Code outlines the company's commitment to sustainability and ethical business practices.

This Code applies to all operations and business activities of the company.

We also expect our suppliers, business partners, and stakeholders to adhere to similar ethical standards and principles as outlined in this Code as well as the Business Partners' Code of Conduct. Failure to comply may result in a review of the business relationship.

The principles outlined in this Code are applicable to all sectors in which the company operates. They are relevant to industries such as manufacturing, services, technology, and other business sectors where sustainability and ethical business practices are required.

The Code complements and does not replace any local, national, or international laws and regulations. Where conflicts arise between the principles in this Code and local laws, the stricter of the two shall apply, provided it does not conflict with mandatory laws.

Each employee is responsible for reading, understanding, and complying with this Code. Violations of this Code may pose negative impacts to the specific employees and potentially lead to disciplinary action, up to and including termination of employment or contract, and potential legal proceedings. Violation of this code could result to financial risk for the company due to potential litigation costs and reputational damage.

## **B. Our Values**

### **Commitment to Performance**

We proudly commit ourselves to deliver results of the highest standards, while promoting business excellence and building long-term relationships with customers, suppliers and all our partners.

### **Technological Leadership & Innovation**

We value and develop technical expertise to constantly deliver competitive cost, high quality and value-adding solutions. We invest in Research and Development, state-of-

the-art industrial equipment, leveraging know-how and innovative thinking to deliver products and solutions that contribute to a sustainable world.

### **Teamwork**

We perform collectively, with respect for one another, towards achieving common goals. We foster inclusiveness, solicit, best use, and reward the skills, talents, ideas, and opinions of all our colleagues.

### **Health & Safety**

We strive to maintain a safe working environment for all employees, with the participation and consultation of our employees. We promote the culture that all injuries and work-related illnesses can and must be prevented.

### **Sustainability**

We value the limited available natural resources and strive to produce our products with the minimum possible impact to the environment and society. We invest in technologies and industrial practices that will ensure the products we deliver to our customers have been produced in an environmentally and socially responsible manner.



## **C. Ethical Standards**

### **Anti-corruption and anti-bribery**

In ETIL S.A., we are committed to act with integrity.

Corruption, money laundering, bribery or other illegal or unethical business activity of any kind are not acceptable in any way or form.

Not only our performance and competitiveness are incompatible to unlawful conduct but are also strengthened by its complete prohibition and absence.

### **Facilitation payments**

Facilitation payments are small payments made to expedite routine governmental actions, such as processing permits or licenses. These payments are considered a form of bribery. Our company strictly prohibits all facilitating payments.

## **Our Foundations**

We are committed to conducting business with honesty, fairness, and integrity and in compliance with all relevant laws. We ensure transparency in all interactions and acknowledge that we have an ethical and legal obligation to act responsibly in all jurisdictions. Our sustainable business growth and success shall rest on the excellence of our products and services. Our performance and competitiveness are strengthened solely through lawful conduct.

*“Perception matters. We must not only act in compliance with the law but also clearly demonstrate that we respect the rules”*

### **Gifts, invitations, and other gratuities**

We do not allow for gratuities that can raise doubt about their integrity or seem to influence business decisions.

Gifts or entertainment of any value to and from any prospective or existing customer or Business Partner (suppliers, contractors, consultants, and business associates) should not be offered or accepted for the purpose of gaining a business advantage.

### **Sponsorships and donations**

Along with the values of responsibility, we make sponsorships and donations, being fully transparent and compliant with local laws, ethics, and practices to promote well-being, social or humanitarian causes as well as cultural or environmental causes.

### **Political donations**

We expressly prohibit the company and its employees from making any political donations or contributions to political parties, candidates, or political causes, as these can be perceived as a means of gaining favorable treatment or influence.

### **Third party agents**

We implement due diligence pertaining to the hiring and the appropriate and regular oversight of commercial agents. We ensure remuneration of agents is appropriate and for legitimate services only.

### **Conflicts of interest**

A conflict of interest occurs when an individual's personal interests might interfere with their professional responsibilities, potentially leading to decisions that are not in the best interest of the company. To minimize conflicts of interest, we adhere to the following principles:

- **Disclosure:** Employees are required to disclose any actual or potential conflicts of interest to their manager or the compliance department. This includes financial interests, family or personal relationships, and external business activities that could influence their decisions or behavior within the company.
- **Minimization:** We are committed to identifying, managing, and minimizing conflicts of interest across the organization. Employees are required to recuse themselves from any decision-making process in which they have a personal stake.
- **Strict prohibitions:** Engaging in activities that create, or appear to create, a conflict of interest with the company's interests is strictly prohibited. This includes accepting personal favors, gifts, or financial interests from suppliers, contractors, or customers. All our decisions as part of our daily work must be based on what is best for the company and our stakeholders.

**We must avoid any potential, actual or perceived conflict of interest as, this can put our reputation and business at risk.**

### **Fair competition**

We always conduct our business in free, fair and open competition, as well as in full compliance with applicable laws and business ethics.

We do not engage in discussions or agreements with competitors, including price-fixing, market allocation or segmentation and thus, do not exchange commercially sensitive information with competitors. Cooperation with authorities when deemed necessary is always provided.

### **Anti-Corruption and Bribery Policies Aligned with the United Nations Convention against Corruption**

As part of our commitment to preventing bribery and corruption, our policies are aligned with the United Nations Convention against Corruption (UNCAC). We undertake the following steps to ensure compliance:

- **Preventive Measures:** We implement preventive measures such as financial and audit controls, due diligence on third parties, and a whistleblower mechanism to detect and address corruption-related risks.
- **Enforcement and Sanctions:** Employees found violating anti-corruption policies will face disciplinary actions.
- **Transparency in Contracts:** We ensure full transparency in all contractual relationships, including procurement processes, to eliminate any potential for corrupt practices.

### **Guidelines on acceptable behavior**

We expect all employees, contractors, and partners to conduct themselves in a manner that reflects the company's values and ethical principles.

#### **Acceptable behavior includes:**

- **Compliance with Laws and Policies:** Adherence to all company policies, local laws, and international regulations governing business conduct.
- **Respect and Professionalism:** Employees must demonstrate respect, professionalism, and fairness when dealing with colleagues, customers, suppliers, and stakeholders.
- **Transparent decision-making:** Business decisions must be made transparently, based on merit and business considerations. Any action that could undermine the company's integrity or reputation must be avoided.

### **Financial or non-financial information disclosure**

We should always report any company related figures with the utmost integrity, ensuring data quality and validity. We always disclose information in a transparent and relevant manner that is not in any way misleading or untruthful.



## D.Social Responsibility

### **Respect, Inclusiveness and Equal Opportunities,**

We hire, assess, reward, manage, and address all people in a manner that does not discriminate based on gender, race, religion, nationality, age, sexual orientation, union affiliation, social, financial or other condition, political or other beliefs and disability.

Any discrimination based on the above or any other criteria will not be accepted. The only decisive factors of employment are performance, experience, efficiency, skills, qualifications, and conduct.

Harassment in any form, bullying or other types of violence do not belong in our culture. We train our employees in the early identification of relevant signs to avoid such behaviors and make use of the reporting tools we provide to that end.

### **Occupational Health and Safety**

We secure that all employees, business partners and visitors are provided with a healthy and safe environment. Our company maps, controls, reports, and deals with prospective hazards and take all precautionary measures against accidents and occupational diseases.

We strive to effectively communicate Health and Safety issues to all stakeholders openly and with transparency. All incidents must be reported and investigated in depth, to implement appropriate corrective and preventive measures and avoid reoccurrence.

Safety is a constant effort and requires vigilance and continuous training.

## Human

### Human Rights

Within ETIL S.A., commitment on ethical principles is extremely important. We support and respect the fundamental principles, as articulated in the Universal Declaration of Human Rights.

We support the protection of international human rights across the business value chain and will not be complicit in any human right abuse. Our policies and procedures adhere to all applicable international, European and national laws and regulations concerning the freedom of association, assembly, and collective bargaining, as well as the prohibition of discrimination, forced and underage labour.

### Health and safety

At the same time, the Health and Safety of our employees and partners is rooted in our values and we secure the diffusion of safe practices in our daily routines and operations.



## **E. Environmental Protection and Climate Change Mitigation**

We adopt a precautionary approach towards environmental and climate change challenges, undertake initiatives to promote greater environmental accountability and encourage the development and incorporation of environmentally friendly technologies.

We always act in accordance to internationally recognized environmental standards. We routinely audit, follow up and report on our environmental performance, with particular emphasis on our contribution, directly or indirectly, to climate change by monitoring and aiming to improve the energy efficiency of our operations as well as the contribution of our business partners.

We abstain from any action that would intentionally or unintentionally negatively affect our company's environmental performance, reputation, and brand names.



### Environment

As active supporters of the UN Sustainable Development Goals (SDGs) we strive to minimize our operational environmental impact and continuously improve performance.

Working with environmental responsibility is an integral part of our operational model. All business decisions and investments are assessed through an environmental lens to secure a net positive environmental impact.

## F. Information and Assets Management

### Insider Information

All non-public information that investors would consider significant to their decisions is treated with the utmost confidentiality and not made available to third parties. Acquiring, selling, or recommending the purchase or sale of securities, based on insider information, is strictly prohibited.

### Information Security

Personal and business-related data is protected against unauthorized access, loss, or manipulation. We make use of and constantly upgrade all available technical means and applicable organizational procedures, in consideration of pertinent international, European and national provisions.

### Company Property

We always handle company's and business partners' property in a responsible manner, to protect our assets, physical and intangible alike, against loss, damage, theft, misapplication, and unauthorized use.

## Data Protection

Any confidential data about our company, trade secrets or other proprietary information, contracts, projects, financial position, customers, suppliers, and partners, must be treated as Confidential Information.

Such information will not be disclosed to persons or organizations outside our company nor unveiled to employees without proper authority.

We are also committed to protecting the personal data of our employees and all stakeholders, thus safeguarding each and everyone's individual privacy.



## G. Business Partners

Please refer to 'Business partners' code of conduct' document.

## H. Distribution and Communication

It falls into the responsibilities of ETIL S.A. management to communicate the content and the spirit of this document to all personnel, direct and associated, also to stakeholders, and to encourage disclosure of any behavior that may be non-compliant with its principles.

The Code of Conduct is published, distributed to all employees, and posted on the companies' intranet, websites, and announcement boards.

We encourage an ongoing dialogue with our stakeholders. We are committed to a two-way and open communication to identify and record needs and expectations.

We believe that the development of mutual trust relations with stakeholders makes a significant contribution to meeting our organization and company's objectives for sustainable development.

### **Employee Training on Business Conduct**

We recognize the importance of continuous education and training on ethical business conduct. As part of our commitment to ethical practices, we provide comprehensive training for all employees

Our training is mandatory for all employees, including senior management, and is particularly emphasized for employees in roles that may be exposed to higher risks of corruption or conflicts of interest (e.g., procurement, sales, government relations).

All employees should receive training on Ethics and Code of Conduct every three years. Affected employees must complete anti-corruption and business ethics training every three years. The depth of coverage is tailored to the employee's role, with specialized training provided for those in high-risk positions.

### **Whistleblowing mechanism**

All employees and stakeholders have the right and obligation to draw the organization's and the companies' attention to circumstances indicating prospective inappropriate and illegal behavior, including but not limited to corruption, bribery, forced labour.

Notifications and complaints may be made anonymously, in accordance with the relevant Whistleblowing mechanism through the established Integrity Hotline (publicly accessible platform on [etil.gr](http://etil.gr) website, by phone or email). Individuals reporting in good faith will not be subject to reprisals or retaliation of any kind, in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council.

Every report received through the Integrity Hotline is to be investigated promptly, independently and objectively, by specially appointed and adequately trained senior executives who consult directly when a critical indication appears.

### **Disciplinary measures for Policy violations**

Disciplinary measures for the Code violations will depend on the severity of the violation and may include:

- Warning or Reprimand: For minor infractions.
- Suspension: For more serious breaches or repeated violations.
- Termination of Employment: For severe ethical breaches, such as bribery or gross misconduct.
- Legal Action: In cases involving criminal behavior, such as fraud or corruption, we may pursue legal action.

### **Governance and accountability**

Responsibility for the implementation of this Code lies with the Business Unit Director, responsible for the company.

### **Compliance and monitoring**

Formal Review Mechanism: The Code will be formally reviewed every two years to ensure its effectiveness and alignment with new regulations, business practices, and sustainability goals. Changes or updates to the Code will be promptly communicated to all employees.



## I. Reference Documents

We comply with the laws, rules and governmental regulations that apply to our businesses and adhere to the standards and restrictions they impose.

We respect statutory provisions and internal operational guidelines, and we ensure that lawful and correct behavior is practiced at every level, including all stakeholders internal and external.

We abide with OECD Guidelines for multinational enterprises and the International Standards on Occupational Safety and Health (ILO).

Wherever national laws or regulations set stricter rules than those set out in this policy, the stricter rules always apply.

Nikolaos Chr. Kopanos

Business Unit Director

ETIL S.A.