



**SUPPLIER  
CODE OF CONDUCT**

## Contents

<b>1.</b>	Introduction	3
<b>2.</b>	Scope of the Code	3
<b>3.</b>	Relations with suppliers	3
<b>4.</b>	Environmental performance	4
<b>5.</b>	Social performance	5
<b>6.</b>	Governance	7
<b>7.</b>	Compliance	10
<b>8.</b>	Supplier attestation	10

## 1. Introduction

The purpose of the Supplier Code of Conduct is to determine the basic requirements that Barba Stathis S.A (hereinafter the “company”) seeks from its suppliers.

The company conducts its business based on its principles and values, which are included in the Code of Business Ethics, and its Sustainable Development Policy.

The Sustainable Development Policy is a management commitment to add the principles of sustainable development to the corporate strategy, as well as to the entire spectrum of activities.

The Supplier Code of Conduct is the basis for the formation of strong relationships of trust with all the company’s partners, contributing to a common sustainable business course, as well as the strengthening of social ethics, integrity and transparency throughout the supply chain.

Suppliers’ compliance with this code, as well as the legal and regulatory framework of their activities, is an important criterion during their evaluation by the company.

## 2. Scope of the Code

This code concerns all the suppliers the company does business with, regardless of the type of supplies, and their place of business. The company encourages all suppliers to comply with the principles and values of the Code.

In case of violation of this code, the company will have zero tolerance and the business relationship will be terminated.

The requirements of this code act in addition to and by no means do they replace the legal framework and/or terms of any legal agreement or contract between the supplier and the company. This code does not generate any third-party beneficiary rights or benefits for suppliers, subcontractors, their employees, or any third party.

## 3. Relations with suppliers

Relations with suppliers are based on their prices, quality, service, financial reliability, integrity and market position. The suppliers selected, offer the company the best possible value and quality of service, as well as terms of delivery and payment.

All those involved in procurement should cultivate and maintain with the suppliers relationships of trust and professional cooperation, encouraging them to offer the best possible service to the company.

Along with maintaining good relationships with existing suppliers, new and improved purchasing sources and approaches should be continuously sought and explored.

All employees involved in procurement should have no vested interest in the suppliers.

Employees collaborating with suppliers must remain objective. More specifically, employees must not accept or request from a supplier any personal benefits that may affect their objective evaluation.

All suppliers should be treated equally in terms of being able to present their products and services to the company and should be provided with fair and equal opportunities. More specifically:

- Competition between existing and potential suppliers should be kept free.
- The technical specifications of a product or service must fully correspond to the request, be clear and detailed.
- Requests for quotations sent to prospective suppliers in order to submit their offers must be identical, while the same preparation time must be provided to all and any additional information or clarifications must be given to all prospective Suppliers at the same time.
- If a deadline extension is granted to a Supplier when submitting an offer, the same extension must be given to all suppliers.

If there are any ethical issues with any of the suppliers and depending on their gravity, the company reserves the right to exclude them.

#### **4. Environmental performance**

The company conducts its business in a manner that respects the environment, aiming to restrict its environmental footprint and promote sustainable development. To this end, the company expects from its Suppliers and Partners to implement environmentally responsible practices and submit alternative solutions to limit the environmental footprint and promote sustainable development.

#### **4.1 Protection of natural resources**

Suppliers must optimize the use of natural resources, with the right interventions in their production process, and by adopting material recycle and reuse practices, whenever possible. Any negative effects on the environments and climate, caused by the supply chain, must be minimized at source, to achieve a more efficient use of natural resources.

#### **4.2 Waste management**

The company's suppliers must have the required certifications and follow the necessary procedures, in order to properly manage and utilize their waste. They are expected to properly implement reliable measures to prevent pollution and minimize the creation of waste and emissions of gaseous pollutants.

#### **4.3 Greenhouse gas emissions**

Greenhouse gas emissions adversely affect climate and are governed by the United Nations Convention on Climate Change. Suppliers are responsible for recording and reducing greenhouse gas emissions generated from their activities.

#### **4.4 Environmental compliance and permits**

Suppliers must reduce their environmental footprint by implementing the applicable legislation and relevant to their field of activity regulations (gas emissions, liquid and solid waste, use of materials, energy, water and biodiversity). They must possess all the required environmental certifications and fulfill the requirements (i.e. waste listing and management) of their respective field of activity.

### **5. Social performance**

The company ensures a safe working environment for all its employees, providing all the necessary means and appropriate training, to protect them from occupational hazards.

The company expects from its suppliers, beyond legal compliance, to cultivate a work culture according to which respect for human resources and responsibility for the protection of human rights in the workplace are fundamental business principles.

## **5.1 Health & Safety at work**

Suppliers must maintain a preventive working environment, by adopting relevant risk management standards, health and safety standards and systematic assessment of potential risks, aiming to promote health and safety at work as a top priority. The goal is to avoid and / or manage unnecessary risks, provide workers with the appropriate personal protection equipment, and continuously upgrade the equipment and work methods.

## **5.2 Work accidents and occupational diseases**

Suppliers commit to observing the procedures and systems for recording, managing and investigating work accidents and occupational diseases. They ensure full compliance with the relevant legislation regarding the prevention of occupational accidents and are opposed to the imposition of sanctions in case of raising concerns regarding workplace safety.

## **5.3 Personal protection equipment**

Suppliers commit to providing their staff with the appropriate personal protection equipment. In case of use of chemical substances, it is necessary to issue Material Safety Data Sheets (MSDS), based on the current legislation.

In case of potential health risks, the company must ensure that their staff uses the right personal protection equipment, as well as any other protective material required by the nature of the work.

## **5.4 Emergency situation systems**

Suppliers must, in the event of an emergency, ensure that the impact on their human resources is minimized by having procedures and policies in place that define the existence of emergency reporting, written notifications to employees, site evacuation procedures, employee training procedures, provision of first aid, appropriate fire detection systems with the necessary equipment, appropriate exits from the facilities, as well as recovery plans.

## **5.5 Wages / Salaries**

Suppliers must be able to demonstrate that they fully comply with the applicable national legislation or industry standards and are committed to paying all their employees daily wages or salaries, and contributions to the social security funds, as well as to providing all benefits defined by law.

## **5.6 Fair treatment and non-discrimination policy**

Suppliers are committed to providing equal opportunities to their employees, against discrimination and any form of harassment. Performance evaluation and employment termination may not rely on discrimination regarding race, sex, color, national or social origin, religion, age, disability, sexual preference and political belief.

The company's suppliers must expressly prohibit the physical or verbal harassment of sexual, racist or defamatory nature at workplace and in any circumstance related to work outside the workplace and ensure employee awareness in this context. They must take all necessary measures to ensure equal pay for equal work in vocational education and training, as well as in decision-making processes.

## **5.7 Prohibition of child labor**

Suppliers must fully harmonize their operation with the current legislation regarding minimum age for employment. Moreover, they must have zero tolerance to child labor incidents and conditions in their supply chain and by extension their entire spectrum of operation.

## **5.8 Forced Labor and Human Trafficking**

Suppliers take all the necessary measures to avoid participating in any form of forced or compulsory labor and human trafficking. They are also committed to preventing any relevant risk that may occur during their business activities, and their supply chain.

## **5.9 Freedom of association**

Suppliers are committed to respecting the fundamental right of the freedom of association and the right to collective negotiation, within the framework of national legislation and existing agreements. They must strongly support open and constructive social dialogue and consult with employee representatives.

# **6. Governance**

The company implements a modern and sound corporate governance system.

Suppliers are invited to share the values and principles of the company, establishing a constructive cooperation, in the context of continuous business improvement, good corporate governance and sustainable development.

## **6.1 Promoting Transparency**

Suppliers are committed to implementing a zero-tolerance policy for bribery, corruption and extortion, in the context of their business activities, and apply lawful practices in matters of advertising, sales and competition.

Suppliers may not offer to company employees any kind of gift or personal benefits that may be perceived as bribery. In any case, no gifts or entertainment may be offered to unethically affect a business relationship, and the applicable laws and ethical standards must not be violated.

The company reserves the right to terminate any sort of collaboration with a supplier in case of failure to comply with the applicable legislation and the relevant regulatory provisions against corruption.

## **6.2 Fair competition**

Suppliers commit to complying with the competition rules of the country or the countries they are doing business in, refrain from unfair business practices, and any other action that hinders legitimate business activity.

## **6.3 Disclosure of information**

The company requires its suppliers to maintain the security of sensitive information regarding its business and financial plans. Such information is defined as confidential and the suppliers must have procedures, as well as means of protection ensured, to avoid their disclosure to competitors and the general public, respecting business confidentiality.

## **6.4 Conflict of interest**

Suppliers must avoid any situation that may be categorized as conflict of interest. In case of conflict of interest, with the participation of any employee or other associate of the supplier, the company shall seek to receive the relevant information immediately.

## **6.5 Legislative & regulatory compliance**

Suppliers must ensure full compliance with all applicable legislative and regulatory requirements and regulations, under which they conduct their business.

## **6.6 Risk assessment & management**

Suppliers must implement all the necessary measures, based on the applicable legislative provisions, regarding the assessment, identification, detection



and prevention of actual or potential risks of corruption, violation of human rights, fundamental rights, health and safety violations, food safety, as well as environmental impact phenomena.

### **6.7 Product quality and safety**

The company has strict product quality standards. This is why it seeks from its suppliers to meet the generally recognized or contractually agreed quality requirements, in order to provide goods that will be safe for consumption. Suppliers must inform the company about any changes in the production process of the products they supply, when it is possible to alter their technical specifications.

### **6.8 Contribution to the local societies**

The company actively contributes to local societies, by seeking to build relationships of trust, and support those in need. It implements initiatives, aiming to create a positive social footprint, by contributing to the empowerment of local communities.

It encourages its suppliers to actively participate in the improvement of the living conditions of the nearby communities, by promoting local development and implementing initiatives aiming to upgrade the quality of life of local societies.

### **6.9 Maintain documents and records**

Suppliers must possess all the necessary documents / professional licenses and / or all those related to the proper execution of the work or service provided to the company, in accordance with the current legislation and regulations. The company may proceed to periodic inspections in the context of each individual agreement with all Suppliers.

### **6.10 Training and skills development**

Suppliers are obliged to provide the appropriate level of training and education, to enable their executives and employees gain the right level of knowledge, comprehension, and ability to implement the policies and respective procedures of the matters addressed in this code.

### **6.11 Continuous improvement**

Suppliers must improve their environmental and social performance, in accordance with the initiatives included in this code, by designing and implementing the appropriate measures.

## 7. Compliance

The company supports long-term relationships, based on trust and respect to its suppliers. A key factor in maintaining and expanding this successful course is the continuous observance of the principles of sustainable development in the full range of its customer and supplier chain.

## 8. Supplier attestation

Me, the undersigned, declare, on behalf of the company.....  
having read the policies and principles described in the Supplier Code of Conduct of Barba Stathis S.A.

Name of Company:

Full name and job title of signee:

Signature and stamp:

Date:

**BARBA STATHIS S.A.**

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