

## ETHICAL CODE

### 1. Employment is freely chosen.

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave upon reasonable notice.

### 2. Freedom of association and the right to collective bargaining are respected.

- 2.1 Workers, without distinction, are free to join or form trade unions of their own preference and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 2.3 Workers' representatives are not discriminated against and have full access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### 3. Working conditions are safe and hygienic.

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Company's responsible person for observing the code is HR Manager.

### 4. Child labour is not to be used.

- 4.1 There shall be no new recruitment of child labour.
- 4.2 The company will develop or participate in and contribute to policies and projects which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.3 These policies and procedures shall conform to the provisions of the relevant ILO standards.

## 5. Living wages are paid.

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any case, wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

## 6. Working hours are not excessive.

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is defined by the applicable national law.
- 6.4 The total hours worked in any seven-day week shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:
  - this is allowed by national law
  - this is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce
  - appropriate safeguards are taken to protect the workers' health & safety and
  - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be allowed at least one day off per seven-day week or, where allowed by national law, two days off per 14-day period.

**7. No discrimination is practiced.**

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

**8. Regular employment is provided.**

- 8.1 To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

**9. No harsh or inhumane treatment is allowed.**

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of bullying are prohibited.

The provisions of the present code constitute minimum and not maximum standards, and this code should not be used to prevent from exceeding these standards. The company complies with this code and national and other applicable laws, and, where the provisions of law and this code address the same subject, the company is expected to apply that provision which affords the greater protection.

The company is committed to operating with respect for all human and labour rights and to complying with ILO (International Labour Organization) conventions and treaties.

In case of deviations from the above ethical practices, you can report it to the HR Manager, the General Manager or Company's legal Department (Mr. George Goulielmos, tel: 2310 240224).

Sindos, 22nd April 2021

Constantinos Constantinidis

Managing Director