

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 have the expectation that our Business Partners will comply with all the principles in this Supplier Code of Conduct and will correspondingly promote these principles within their own supply chain.

1. Business ethics and anti-corruption

Business integrity

ElvalHalcor expects from its Business Partners 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

ElvalHalcor expects that its Business Partners avoid behaviour or actions that would be an offense under any applicable laws relating to corruption and bribery.

Fair business and competition

The ElvalHalcor’s Business Partners are required to conduct their business activities in accordance with all applicable antitrust, competition and fair trade practice laws.

2. Labour and human rights

Equal opportunities

ElvalHalcor expects from its Business Partners 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.

Child and forced labour

ElvalHalcor expects from its Business Partners 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.

ElvalHalcor expects from its 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 implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers’ return to work.

Freedom of association and collective bargaining

ElvalHalcor expects from its Business Partners 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

ElvalHalcor expects that its Business Partners 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 maintain 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

ElvalHalcor expects from its Business Partners 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 minimise generation of solid waste, wastewater and air emissions.

Product content restrictions

Business Partners are expected to adhere to all applicable laws, regulations regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

4. Personal data protection

ElvalHalcor respects the personal data protection and undertakes 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, it adapted a Personal Data Protection Policy and established strict procedures for the protection of personal data throughout its spectrum of activities.

Supplier acknowledgement

I, the undersigned, acknowledge on behalf of the companythat I have read and I understand the policies and principles described in the ElvalHalcor Supplier Code of Conduct.

Company Name: _____

Signer’s name and title: _____

Signature and stamp:

Date: _____

Validity of the Code of Conduct

ElvalHalcor reserves the right to reasonably change the requirements of this Supplier Code of Conduct due to changes to the Company’s Code of Conduct and Business Ethics. In such an event ElvalHalcor will inform its Suppliers and expects them to accept those reasonable changes.

