



**cosmos**

EXPERTS IN ALUMINIUM™

**Suppliers Code  
of Conduct**



## 1. INTRODUCTION

Cosmos Aluminium continues to support and promote the UN Global Compact initiative on the integration of the internationally recognized ten core principles of the Compact in its business activities and throughout its supply chain. These Principles relate to the areas of human rights, working conditions, environmental protection and the fight against corruption.

These Principles are at the heart of every business presence of Cosmos Aluminium and are expressed through its continuous efforts to ensure that its policies, strategies and procedures comply with them.

The company acts in accordance with this Code of Conduct, the Human Rights & Labour Practices Policy, the Business Ethics & Anti-Corruption Policy and the Policy for the Prevention and Combating of Violence and Harassment at Work and the Cosmos Group's Internal Complaints Management Policy.

**The Aim of Cosmos Aluminium** is to convey its own culture of integrity, transparency and public accountability to its suppliers, project contractors, external consultants and partners (hereinafter referred to as "Suppliers") and to make it a condition of cooperation that the said Principles are adhered to, which will be incorporated in the contract signed between them. It requires its Suppliers to adopt and apply these Principles in their dealings with their employees and partners throughout the supply chain.

In addition, the company is publicly committed for the first time to adopting socially responsible, sustainable and ethical business conduct, as presented in the first Sustainable Development Report for the year 2022. It is posted on the website of [www.cosmosaluminium.gr](http://www.cosmosaluminium.gr)

**The aim of this Code is to** establish it as a basic contractual obligation under the cooperation agreement, but also to ensure its effective implementation. Suppliers are expected to be evaluated on their performance in environmental and social issues, as well as corporate governance issues (ESG indicators).



## 2. RELATION OF THE CODE TO SUPPLIERS' CONTRACTUAL OBLIGATIONS

This Code contains guidelines and is voluntary. However, Cosmos Aluminium requires its Suppliers to comply with all applicable laws, regulations and contractual obligations agreed between them. In addition, it expects them to comply with any international trade sanctions and penalties imposed by the EU.

In this context, Cosmos Aluminium is committed to seeking commercial partnerships with existing and new Suppliers, with whom it will ensure the following:

- Compliance with this Code and its definition as a prerequisite for all Suppliers, as well as any subcontractors that each Supplier uses on behalf of Cosmos Aluminium.
- Respect for recognized human rights and respect for the privacy and dignity of every individual.
- Optimisation of the supply chain through sustainable practices and processes.
- Selection of Suppliers taking into account the evaluation of their cooperation.
- Implementation and monitoring of corporate governance practices to comply with the cooperation agreements and applicable legislation. Exchange of best practices and provision of training where possible.
- Compliance with environmental legislation and regulations, as well as evaluation of the environmental objectives and practices of its suppliers.
- Compliance with all applicable laws and regulations concerning the prohibition or restriction of specific substances, including labelling for recycling and disposal, e.g. REACH regulation, hazardous substance restrictions (RoHS), CE (EC) marking, etc.

## 3. APPLICATION OF THE PRINCIPLES

### 3.1. Practices for the protection of human rights

For Cosmos Aluminium, the health and safety of its employees and suppliers is a top priority as the basis of its business plans. It therefore expects all its Suppliers without exception to apply the following, as set out in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Core Labour Standards:



▪ **Prohibition of discrimination:**

The Supplier shall not discriminate on the basis of origin, religion, age, sexual orientation, gender identity, colour, political opinion or any other status protected by national, Community or international law. This includes discrimination in the provision of equal opportunities for employment, education and career development.

▪ **Fair treatment of workers, without violence and harassment:**

The supplier must treat all its employees with respect and dignity and prohibit offensive or inappropriate behaviour, as well as any form of verbal, physical, psychological or sexual violence, intimidation and any form of inhuman and unreasonable treatment. In addition, it shows zero tolerance for gender inequitable behaviour.

▪ **Freedom of association:**

The Supplier must respectfully accept the right of employees to participate in legally organized labour unions and strikes. The Supplier must support dialogue with its employees and accept negotiations between them on matters relating to working conditions and economic interests without fear of retaliation, in accordance with applicable laws and regulations.

▪ **Prohibition of child labour:**

The Supplier does not offer employment to children under the legal age of 18 and expects its Suppliers to demonstrate the same attitude throughout its supply chain.

▪ **Prohibition of forced labour:**

The Supplier condemns and prohibits all forms of forced labour and slave labour and human trafficking. To this end, it recognises its responsibility to remain aware of any relevant risk and to ensure that the necessary measures are taken to ensure that all work within its activities is voluntary.

▪ **Pay and working hours:**

The Supplier shall ensure fair remuneration and provision of all benefits to its employees, taking into account the applicable national legislation, and that such remuneration is at the expected levels for the employment sector. Under no circumstances will it take a pay cut as a disciplinary sanction. In addition, it will respect the working hours of its employees, who will be compensated for overtime and will not work more than the maximum working hours as defined by the International Labour Organization (ILO).



## ▪ Health and safety at work:

All suppliers without exception must guarantee the safety and health of their employees in the workplace. To this end, they must implement procedures to ensure that their employees comply with applicable laws and regulations, as well as regular training programmes on topics such as occupational health and safety, emergency response, protection from machinery, etc.

Appropriate personal protective equipment must be provided free of charge to all workers when they perform tasks that are hazardous to their health, and they must be trained in its correct use.

The Supplier is required to provide all employees with a safe and healthy workplace, to take steps to minimise the causes of risks associated with the working environment and to provide special care for the sensitive population.

## 3.2 Business Ethics Practices

Cosmos Aluminium requires its Suppliers to comply with the following:

### ▪ Fighting Corruption and Bribery:

The Supplier shall refrain from prohibited business practices involving any form of corruption and bribery in the course of its business, including actions that could be construed as such.

In addition, it requires its Suppliers not to offer, promise or accept any benefits or advantages (such as gifts, money, hospitality, etc.) in order to obtain preferential treatment, influence decisions and/or breach of duty, so that Cosmos Aluminium may gain an unfair advantage.

### **Cosmos Aluminium is committed to, and requires from its Suppliers to:**

- Maintain a policy of honesty and integrity and participate in actions that contribute to the fight against corruption.
- Comply with the applicable legislation and relevant anti-corruption and anti-bribery regulations in the countries in which they operate as a selection criterion.
- Demonstrate "zero tolerance" in these matters and discontinue any form of cooperation with suppliers, partners and employees throughout their supply chain.
- Donations to political parties and public officials: The Supplier shall not make financial or other contributions to political parties, public officials or persons holding public office, unless permitted by law.
- Sponsorships: All sponsorships in which Supplier participates must comply with applicable law.





- Fair competition: Cosmos Aluminium only works with Suppliers that comply with the applicable legal framework, accept fair competition and monopoly regulations, and apply values such as honesty, fairness and integrity in all their business activities. The Supplier accepts these principles and understands that fair competition promotes sustainable business-to-business growth.
- Safety of Personal and Confidential Data: Cosmos Aluminium requires all its affiliated Suppliers to accept and comply with the applicable data protection laws (GDPR). Therefore, it expects its Suppliers to have developed procedures for the management, processing and dissemination of personal data in all workplaces, in accordance with the provisions of the General Data Protection Regulation (EU) 679/2016 and its incorporation in Law 4624/2019.
- An integral condition of cooperation is also considered to be the observance of business confidentiality between its suppliers, as described in detail in the cooperation agreement. Business confidentiality covers any kind of information asset belonging to a company. Any misrepresentation of trade secret information is not acceptable to its Suppliers.
- Money laundering: Cosmos Aluminium enters into employment relationships only with Suppliers who are performing legitimate activities and who are not involved or have not been involved in the past in money laundering activities, such as terrorism, drugs, tax evasion, bribery, etc.
- It is very important for Cosmos Aluminium to work with companies that have clear principles and policies on the issue of money laundering and that their sources of funds are legal.
- Minerals from conflict zones (conflict materials): Cosmos Aluminium commits its Suppliers not to use minerals originating from areas of armed conflict and not to contribute to any conflict-affected country (Conflict Zones) as defined in the OECD Guidelines. The Supplier must exercise due diligence at the source and in the mineral supply chain and have relevant evidence of the origin of the mineral materials.

### 3.3 Environmental Protection Strategies

Cosmos Aluminium recognizes its social responsibility for the protection of the environment and aspires to continuously reduce the environmental impact of its activities through actions and targets, as described in the first Sustainability Report for the year 2022 and the following ones. In detail:

#### ▪ Environmental Compliance:

It requires its Suppliers to apply all environmental laws and regulations, which regulate issues related to air pollution, waste management, water resources management, prohibition and restriction of the use of certain substances, recycling of materials, climate law, etc.





It requires its Suppliers to hold and amend as appropriate the required environmental permits and approvals for the operation of their businesses, and to implement environmentally responsible practices to address the requirements of such permits.

▪ **Green Economy:**

Cosmos Aluminium requires its Suppliers to aim for the transition of the Green Economy by promoting actions and investments in the areas of climate change, sustainable development and the environment in general. Green Growth is an attempt to reconcile two basic but conflicting needs: for economic growth and environmental protection. The Supplier must understand that the transition to the Green Economy will also help to improve their competitiveness.

▪ **Sustainable use of natural resources:**

The Supplier must implement appropriate measures to ensure the sustainable use of materials and natural resources in its business activities, such as water, gas, minerals, forests and soil. Modes of use of natural resources should include restrictions to avoid environmental pollution, address climate change and integrate circular economy principles.

▪ **Waste Management:**

The Supplier must prevent and eliminate the generation of waste (gaseous, liquid and solid) wherever possible by establishing actions for the reduction, reuse and recycling of materials. The waste generated must be identified and managed appropriately, in accordance with current legislation, so that it does not pose a threat to the environment.

In particular, it must refrain from using mercury/mercury compounds in the production of products and from handling mercury waste, in accordance with the provisions of the Minamata Convention.

▪ **Gas emissions:**

The Supplier shall manage its emissions in accordance with the environmental permits. It is required to have systems in place to record and manage the emissions of gases from its activity, in particular carbon dioxide CO<sub>2</sub>, and where feasible methane CH<sub>4</sub> and nitrogen monoxide NO.

It requires its suppliers to disclose greenhouse gas (GHG) emissions data, which must be confirmed by accredited measurement laboratories. In any case, if requested by Cosmos Aluminium, the Supplier should be able to present action plans for GHG emission reduction.





## ▪ Persistent Organic Pollutants (POPs):

With regard to the use of persistent organic pollutants, the Supplier must comply with the international restrictions or prohibitions of such substances as established in the EU by the Stockholm Convention on Persistent Organic Pollutants (EU Regulation 2019/1021) on the production, import/export and recycling provisions of such substances. They are a major threat to human health and the environment, which is why they are included in the European list of harmful substances. Greece is harmonised to the Regulation through the M.D. 30/004/000/325/2023 (OG 1330/B' 8.3.2023).

## ▪ Application of ISO International Standards:

Suppliers are encouraged to implement an Environmental Management System in accordance with ISO 14001 as an aid to record and address environmental issues, legal and commercial challenges. In addition, it expects its suppliers to set targets for reducing their energy consumption and to demonstrate improvements and compliance through the implementation of an Energy Management System according to EN ISO 50001.

### 3.4. Compliance practices with the Principles

- Compliance Controls: The Supplier must comply with the principles of the Code of Conduct and will be bound by it for the duration of the cooperation agreement. Upon request, it will provide the relevant evidence documenting compliance and will additionally accept various controls that may be deemed necessary by Cosmos Aluminium (e.g. legal, technical, quality, environmental, etc.).
- Corrective Action Procedure: Through an internal procedure, the Supplier should be able to identify non-compliances of itself or any of its subcontractors with the Authorities and inform Cosmos Aluminium immediately. This information should include the corrective measures to be taken to ensure compliance within a specified period of time.
- Supplier Information: Each Supplier will be informed in detail of the contents of this Code and will sign a declaration to the following effect. In order to promote the Code in its supply chain, the Supplier should undertake to train its employees and executives, if necessary, to ensure that all issues covered by this Code are understood by all parties involved.

Similarly, a competent team of Cosmos Aluminium will be at the disposal of its Suppliers for clarifications at 2410-567533, [vyotop@cosmosaluminium.gr](mailto:vyotop@cosmosaluminium.gr) (Mrs. Vasso Yotopoulou) and 2410-567574, [kzelfos@cosmosaluminium.gr](mailto:kzelfos@cosmosaluminium.gr) (Mr. Konstantinos Zelfos).







▪ **Supplier evaluation:**

A questionnaire, upon request, will be used to determine the Supplier's compliance with the Principles and criteria of this Code. The results of the evaluation will be communicated to the Supplier and corrective actions will be proposed.

▪ **Validity of the Code of Conduct**

Cosmos Aluminium reserves the right to make reasonable changes to the requirements of this Code and will inform Suppliers in writing and promptly

## DECLARATION OF PARTNER/SUPPLIER

The undersigned, on behalf of the company \_\_\_\_\_

I declare that I have read and understand the policies and principles, terms and conditions set out in the Supplier Code of Conduct and confirm that the company adheres to and is committed to complying with this Code.

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

Signatory's Name and title: \_\_\_\_\_

Signature and seal: \_\_\_\_\_



### 3.5 Submitting reports and complaints:

The Supplier must ensure that it provides everyone with the opportunity to express their opinion through the submission of reports and complaints, such as harassment, discrimination, dangerous situations, with the aim of resolving them immediately.

Cosmos Aluminium is committed to fostering a business spirit of transparency and responsibility. Therefore, it demands the highest possible level of professional and ethical conduct from all its employees and business partners. In order to establish the prevention of offences, unethical and illegal behaviour, we want to make sure that any person who has suspicions about the above issues regarding the operation of our Company has the opportunity to report them (remaining anonymous if they wish) without fear of reprisals from the Company's side.

In this context, we have developed a partnership with an independent, external complaints system to make it easier and safer to report complaints:



<https://whistleblowersoftware.com/secure/994a6dff-5e31-4767-b328-b94bc06f6dd7>

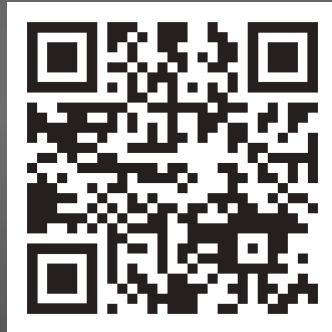
The Chairman of the Board

Xenofon I. Kantonias



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