



cosmos

EXPERTS IN ALUMINIUM™

Human Rights and Labour Practices Policy



1. COMMITMENT TO RESPECT HUMAN RIGHTS

Cosmos Aluminium (hereinafter the company) recognises human rights and is committed to defending them for all those who are employed by the company, either as subordinate relationship or provision of services, as well as for partners, such as suppliers, contractors, service providers, etc. The primary purpose is to ensure this commitment through proactive actions in order to immediately identify situations and behaviours that violate human rights both within the company's internal environment and its sphere of influence. It is important to stress that there is zero tolerance for cooperation with companies and individuals who have been proven to be involved in cases of human rights violations. The company's business activities are aligned with the United Nations Guiding Principles on Business and Human Rights, adhering to meritocratic conduct in accordance with the National Human Rights Action Plan in force in Greece.

In addition, this policy is based on the following:

- Fundamental principles of the Greek Constitution
- Principles of the United Nations Universal Declaration of Human Rights
- United Nations Global Compact (UN Global Compact (UNGC))
- Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO)
- The Charter of Fundamental Rights of the European Union

We expect our business partners to also commit to respecting and protecting labour & social human rights and to establish appropriate due diligence procedures.

2. RESPECT FOR LABOUR RIGHTS

2.1 Health & Safety at Work

- The company supports the protection of internationally recognized human rights and ensures that any kind of violation or infringement of these rights is avoided in all areas of its business activities, including its subsidiaries.
- The protection of the health and safety of its human resources, as well as of third parties (contractors, suppliers, partners, customers, visitors) is a primary concern in the conduct of its activities and a commitment.
- The company has a policy of continuous improvement of its working methods through the application of high safety standards and the awareness of employees to actively participate in the prevention of accidents.
- The security of its facilities is enhanced by employing security personnel 24 hours a day.



2.2 Appropriate working conditions

- The company is committed to maintaining a working environment that respects the fundamental rights of employees, taking into account the following aspects:
- Appropriate pay, allowances and benefits, based on the current legislative framework
- Conclusion of collective agreements, drawn up and signed in a language they understand and containing all the agreed terms and conditions of employment in favour of their mutual interests.
- Right to information and access to payroll receipts, maintaining an open dialogue with its employees.
- Observance of working hours and regulation of voluntary overtime with pay, in accordance with the provisions of the applicable national legislation.
- Freedom of association, the right to collective bargaining and the right to strike. The company fosters dialogue and engages in negotiations with workers who are members of legally organised trade unions with full respect.

3. RESPECT FOR SOCIAL RIGHTS

3.1. Equal opportunities, without discrimination

- It ensures that decisions related to the employment of its employees and managers are based only on their qualifications, experience, competence and efficiency.
- It prohibits any discrimination based on origin, religion, age, sexual orientation, gender identity, colour, political opinion or any other status protected by national, Community or international law.
- It respects and promotes diversity and provides equal opportunities for employment, training, pay and performance appraisal.
- All employees are provided with equal opportunities for training and career development and have zero tolerance for discriminatory and unfair treatment between genders.
- It respects the privacy of personal data (GDPR) of its employees in all workplaces.

3.2. Harassment, violation and violence at work

- It prohibits and does not tolerate offensive or inappropriate behaviour, as well as any form of verbal, physical, psychological or sexual violence, intimidation and harassment of any kind.

3.3. Forced labour, child labour and trafficking in human beings

- The company 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.

- It prohibits the employment of persons under 18 years of age, as defined by the competent authorities and relevant legal restrictions and opposes all forms of child exploitation in all its activities.
- It does not offer employment to children under the legal age of 18 and expects its partners and customers to demonstrate the same attitude.

4. RESPONSIBILITY FOR THE POLICY

4.1. Application monitoring:

Cosmos Aluminium complies with the provisions of this Policy, as well as with the National legal framework and relevant regulations. Senior management is responsible for the effective implementation of the principles of this Policy within their sphere of influence. It expects its business partners to adopt and adhere to similar policies and to comply with the applicable laws of the country in which they operate.

4.2. Adoption and review:

This Policy is approved by the Board of Directors and signed by the Chairman of the Board of Directors. It is reviewed annually and revised as necessary. Under the responsibility of the senior management, this Policy is communicated to employees (via email and posting on the Notice Board), as well as posted on the website

www.cosmosaluminium.com

4.3. Reporting of violations:

The Company 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>



Alternatively, in the event of a violation of a human rights principle or even a suspected violation, then any employee of the company is encouraged to contact Mrs Stella Keoglou at Tel.: 2144-092720 or at humanresources@etem.com, to submit the relevant report/complaint.

The Chairman of the Board

Xenofon I. Kantonias



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