



cosmos

EXPERTS IN ALUMINIUM™

Business Ethics and Anti-Corruption Policy



1. COMMITMENT

Cosmos Aluminium (hereinafter the company) is committed to pursuing fair and competitive practices in all aspects of its business. It understands the importance of healthy competition and always acts legally with respect for the environment and the society in which it operates.

Aim of the company is to convey its culture of integrity, transparency and public accountability to its employees as well as to its suppliers, contractors, external consultants and partners (hereinafter "Suppliers") and to set as a condition of cooperation the observance and promotion of integrity and transparency in their dealings with the company and throughout their supply chain.

It actively cooperates with all interested parties (employees, suppliers) to help shape a regulatory framework that promotes healthy competition, ensures that appropriate corruption prevention procedures are in place and promotes overall social welfare. Any violation of this policy will result in severe sanctions, as provided for, and termination of cooperation and referral to the competent judicial authorities.

2. AIM

The aim of his Policy is to:

- initially provide all its employees, Partners and Suppliers with information on the prevention, detection and suppression of acts of corruption,
- summarise the principles and controls that the company follows to prevent corruption at all levels,
- be the subject of training and awareness-raising for the company's employees, Management Team and Suppliers, who are responsible for its implementation.
- be established as a basic requirement for the cooperation of all implicated party with the company,
- set out in writing both the responsibilities of the management and of all its implicated parties with regard to participation and the fight against corruption,
- ensure its effective implementation and regular updating

The company acts in accordance with this Policy, the Human Rights Policy & Labour Practices, the Policy on Preventing and Combating Violence and Harassment at Work and Internal Complaints Management Policy and the Group's Supplier Code of Conduct of **Cosmos Group**.

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



3. COMPLIANCE WITH PRINCIPLES AND CONTROLS

3.1 Transparency

The company recognises that only through transparency and a strong culture of integrity in its business transactions can it achieve its future goals of upward financial growth with sustainability criteria.

Alongside the values of taking responsibility, it recognises that it has a moral and legal obligation to act responsibly in all relevant jurisdictions. It conducts its business activities in a free, fair and open competition, in compliance with applicable legislation and professional ethics.

It maintains a system of internal accounting controls (books, records) that accurately and fairly reflects transactions and the disposition of assets.

It provides with a transparent and timely notification of its cases to the interested parties.

3.2 Zero Tolerance to Fraud and Corruption

Fraud and corruption pose a serious threat to the sustainable development of Cosmos Aluminium's business and the countries in which it operates. The protection of these interests is a priority of the company's management and is carried out with absolute transparency, integrity and legality. The company is not tolerant of any form of corruption (direct and indirect) because it erodes trust among its business partners, as it damages its reputation and credibility in the local and global market. It requires compliance with local laws and regulations in all their actions and activities.

It participates in the international fight against money laundering and related international initiatives and adopts measures to fully comply with the relevant provisions.

3.3 Bribes and facilitations

The company has zero tolerance for bribes, such as giving or accepting gifts, money, hospitality, entertainment, to influence a business decision or facilitate payments. It strictly prohibits facilitating payments, even if such payments are common practice in the country concerned. The giving and accepting of non-monetary gifts of small value is permitted between partners and suppliers only in the context of common decency.

In addition, it prohibits the reimbursement of travel and accommodation expenses of its employees for inappropriately influencing a business decision or official action. It requires the same attitude from its business partners, agents and suppliers in their own dealings.



It has recognised that it is necessary to put the collective interest ahead of the individual interest in order to fight fraud, corruption, all illegal activities and practices that could create such perceptions

3.4 Abuse of power

An important area of corruption is abuse of position, i.e. when someone who holds a position in the public administration uses it to benefit the interests of a company. These practices of undue influence are not acceptable to the company, which is why it is committed to acting professionally, fairly and respectfully in all its business dealings and to complying with the legal regulatory framework of each country in which it operates.

The company declares its opposition to financial aid and donations from political parties, representatives of political parties, state officials, public officials or persons holding public office. It requires additional records to be maintained for all expenditures related to public employees and state officials.

It seeks to gain competitive advantages only through the provision of quality products based on research and development and technological advancement, but not through unethical and illegal business practices.

3.5 Donations and sponsorships

All sponsorships and donations for charitable and public benefit purposes, which the company makes or participates in, are in accordance with the applicable legislation and are carried out in a fully transparent and ethical manner. It strictly prohibits the participation of its officials, associates and partners in donations that are linked to the receipt of a personal benefit or advantage on behalf of third parties. The company openly declares that it supports social actions that promote education, culture, sport and good environmental behaviour in a transparent and legal manner and only after approval by the Board of Directors.

3.6 Control of agents and partners

The company has understood its responsibility towards this Policy and is committed to seek to conduct appropriate checks before entering into cooperation or representation with individuals or companies in Greece and abroad, such as reputation checks, background checks, payment of guarantees and supporting documents, etc.

3.7 Information and Training

The company is committed to seek continuous information and training of its executives, employees and suppliers on matters related to this Policy.



4. RESPONSIBILITY FOR THE POLICY

4.1. Adoption and review

This Policy has been approved by the Board of Directors and is signed by the Chairman of the Board of Directors. In the event of any differences between the content of this policy and the applicable national legislation or other applicable standards, the most stringent requirements shall prevail..

4.2. Application monitoring:

A competent management team is responsible for reviewing and monitoring the content of this Policy, ensuring that it is adequately communicated (visitor reception area, corporate website, correspondence), as well as presenting any non-compliance with the Policy to the Board of Directors' meetings. In addition, this group will oversee the provision of training for the needs of the Policy. The supervision team for this policy is composed of at least three people when making decisions. This group includes:

- Members of the Board of Directors
- Financial Director
- Commercial Director
- Production Director

4.3. Reporting of violations::

Our 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>

The Chairman of the Board

Xenofon I. Kantonias



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