SUPPLIER code of conduct

11:

vitex





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Vitex S.A., driven by the fundamental principles and values that govern all its business activities, has established high standards of corporate responsibility. Additionally, it is equally important for us to share the same environmental and social culture with our network of suppliers.

Our suppliers are not expected to do things that we do not do ourselves for which we are committed to doing in accordance with our own Code of Conduct. In this context, and to ensure the existence and implementation of sustainable development principles in our supply chain, we carefully select suppliers based on shared values and a due diligence process. We expect all suppliers, contractors, subcontractors, partners, consultants and other providers of goods and services who do business with us (collectively referred to as "Suppliers") to comply with all the principles of this Supplier Code of Conduct and to promote Vitex's core values of ethics and sustainability, within their own supply chain and we are committed to maintaining long-term relationships with them in the areas where they contribute ongoing business value.

We also expect our Suppliers to agree to evaluate their performance on sustainable development issues, such as ethical, social and environmental, relating to either our company's operations or those of third parties associated with our company as we consider the principles expressed in this Supplier Code of Conduct to be an important element of their selection and evaluation.

Our ethical requirements include the following aspects of the 3 key pillars of this Supplier Code of Conduct:



Business integrity

Employee rights

Environmental **protection**



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Regulatory Compliance

Suppliers must comply with all applicable national laws and regulations in all countries in which they operate.

Preventing and fighting corruption

Suppliers must maintain high standards of integrity, transparency and corporate governance and refrain from any form of corruption, bribery, extortion, and abuse or actions that could be construed as such.

They must have in place and implement policies and procedures to deal with any such incident in a proactive and repressive manner.

Competition Law Compliance

Suppliers must respect the rules of free competition and act in accordance with the applicable legal framework on free competition, monopolies, and fair competition practices.

Avoiding Conflicts of Interest

Suppliers must refrain from any situation or circumstance that could be described as a conflict of interest.

In situations where personal interests may conflict with the interests of our company, they must inform Vitex of their activity as a Supplier, including disclosure of any existing financial interest of an employee of Vitex in the Supplier's company.

Security and Privacy / Confidentiality

Suppliers must comply with the applicable legal framework for the protection of the personal data of their employees, suppliers, customers, and partners and safeguard it from use other than the lawful or agreed use, interception, alteration, or destruction. They are also required to maintain the confidentiality of the information brought to their attention because of their relationship with Vitex, as well as to respect industrial and intellectual property rights.

Quality of products and services - Compliance with agreements

The products or services offered by the Suppliers must comply with the specifications and safety requirements defined by the applicable national legislation and there must be no deviation in the quality of the products/services provided or in the level of pricing. They are obliged to invoice in accordance with the applicable agreements and in case of a change in pricing policy or desired changes in the way of cooperation, they must inform Vitex in writing and in time.





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Equal opportunities / Avoiding Violence and Harassment

Suppliers must treat all their employees equally and fairly and base employment decisions on merit - not on race, national origin, skin color, gender, religion, age, sexual orientation, gender identity, disability, marital status, or any other characteristic protected by applicable law. They must show zero tolerance for any form of abuse or harassment, including actions that may reasonably be perceived as threatening, offensive or discriminatory, as well as any form of sexual harassment.

Prohibition of forced and child labor

Work must be of free will and in accordance with the laws of the country of operation. Suppliers must prohibit any form of forced labor that is a violation of human rights. They must also strictly respect the legal working age limits in force in the countries where they operate and declare their opposition to any phenomenon that leads to the exploitation of children.

Occupational Health and Safety

Suppliers must comply with all applicable workplace safety laws and regulations and provide their employees with a healthy and safe working environment. In this context, they are expected to adopt appropriate health and safety practices in all aspects of their activities, such as: occupational safety (limiting workers' exposure to potential hazards), prevention and reporting of work-related injuries and illnesses, emergency preparedness (implementation of emergency plans and response procedures, including drills and training of employees), access to a clean and safe working environment (such as clean toilet facilities and drinking water), and clear notification of health and safety information.

The establishment and implementation by Suppliers of health and safety management systems of international standards is encouraged and will be considered for the purposes of their evaluation.

Working Hours / Remuneration

Suppliers must comply with applicable legislation on working hours and any overtime, including legislation on maximum working hours and rest time. Also ensure that fair and reasonable remuneration is paid on time, respecting any statutory thresholds and any legal or agreed additional benefits. Wage withholding as a disciplinary measure is not acceptable.

Right to join a trade union

Suppliers must respect the right of employees to choose whether to form or join trade unions to defend their interests in a lawful and peaceful manner, and to participate or refrain from participating in collective bargaining - without sanction, discrimination, or interference.





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Environmental compliance

Suppliers must comply with all environmental permits and approvals required by law and comply with the operational requirements of such permits.

Environmental management

We expect our Suppliers to manage the environmental issues associated with their activities in a prudent and rational manner and to take all necessary measures to improve their environmental performance. They should support the circular economy, where principles such as waste reduction, reuse and recycling are integrated into the life cycle of a product. Suppliers must minimize or ensure the avoidance of air emissions, energy consumption, and CO2emissions. They should identify, monitor, and manage in accordance with applicable legislation the waste generated by all their activities and ensure that it is reduced. Suppliers should ensure the rational use of materials and natural resources to reduce their environmental impact. Vitex will positively evaluate the voluntary implementation of environmental management systems by its Suppliers.

Material restrictions

Suppliers must comply with all applicable laws and regulations regarding the prohibition or restriction of specific substances and minerals of disputed origin, including labeling for recycling and disposal, e.g., REACH, CE marking, RoHS (Restriction of Hazardous Substances).



Compliance with the Code of Conduct

Vitex will continuously monitor Compliance with this Code. The findings that ensure its proper compliance, as well as any further revision, is the responsibility of our company's management. Where there is a difference between the requirements of the law and the principles of this Code, we expect our Suppliers to comply with the stricter standard.

Vitex reserves the right to conduct audits to verify Suppliers' compliance with this Code. Incidents of non-compliance should be corrected immediately, otherwise they may result in the termination of cooperation. Vitex may be reported by the Suppliers, e.g., by their employees or agents. Anonymized reports are encouraged and can be submitted through the following channels:

- by calling the number +30 2105589507
- by e-mail to report@vitex.gr

• through a personal meeting with Vitex's Receiving and Reporting Monitoring Manager appointed within five (5) working days of the Supplier's request by telephone or in writing to the above contact details

*The reporting channels, the appointment of a Reporting Receiving and Monitoring Officer, as well as the safeguards for the protection of whistleblowers, ensuring confidentiality and appropriate protection and weighting of the personal data of the parties involved throughout the process are governed by the "Public Interest Whistleblower Protection Policy" adopted by Vitex and posted on its official website www.vitex.gr

Infringement Reporting System

Vitex has designed and operates an internal whistleblowing system in accordance with the guidelines of Directive (EU) 2019/1937 and national law. 4990/2022. Under this internal reporting system, any violations of this Code and/or violations of the above legislation that come to the attention during the operation of their commercial cooperation with



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