

# Supplier Code of Conduct

This Supplier Code of Conduct has the goal of ensuring that our suppliers, contractors, consultants and business associates (“Business Partners”) share and promote Cenergy Holdings’ fundamental values in ethics and sustainability principles. The Company requires its Business Partners to comply with all the principles in this Supplier Code of Conduct and will correspondingly promote these principles within its own supply chain.

Business Partners are expected to agree to an assessment of their performance on sustainability issues such as their environmental, social, and ethical performance either performed by the Company or by third parties associated with the Company. The participation of Business Partners in the sustainability assessment is considered essential for the business relation with Corinth Pipeworks as sound sustainability practices are expected from all of our Business Partners.

## Business ethics and anti-corruption

### Compliance

Business Partners are required to comply with all applicable local laws and regulations, including in all the countries in which they operate. Business Partners should have a formal system to establish rules and indicators, keep records and trigger corrective actions, in case of legal breaches or any violations of this Code, endorsed by senior management of the Supplier. Business Partners shall at any moment and upon request of Viohalco companies, be able to disclose information and performance indicators on business activities, labor, health and safety and environmental practices.

### Business integrity

Business Partners are required 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

Business Partners are required to avoid behavior or actions that would be an offense under any applicable laws relating to corruption and bribery.

### Fair business and competition

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

### No improper advantage

Business Partners must not offer or accept bribes or other means of obtaining undue or improper advantage.

### Fair competition

Cenergy Holdings conducts its business in free, fair and open competition. The Company’s policy is to compete vigorously and fairly, but always in full compliance with applicable laws and business ethics.

Cenergy Holdings must comply with all applicable antitrust and competition laws and is committed to dealing with competitors with honesty, fairness and integrity. Competitive advantages are gained through the product offering based on innovation, R&D and engineering and not through unethical or illegal business practices. The Company do not enter into anti-competitive agreements with competitors, including price-fixing, market allocation or segmentation. Cenergy Holdings does not exchange commercially sensitive information with competitors.

## Labour and human rights

### Equal opportunities

Business Partners are expected to provide equality of opportunity and treatment and not to apply any form of discrimination in hiring and employment practices on grounds of race, color, 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

Business Partners are required 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.

Cenergy Holdings requires from its Business Partners to reject any form of forced or compulsory labor.

### 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 comply with all applicable, health and safety laws and regulations and to implement, where necessary, corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

### Working hours, wages and benefits

Business Partners shall follow all applicable laws with respect to working hours, wages and benefits. Overtime shall be compensated at the prevailing overtime rates.

### Freedom of association and collective bargaining

Business Partners are expected to recognize and respect the right of employees to join or not join labor unions, associations or any other lawful organization and to comply with all relevant applicable local and national laws.

### Conflict minerals

Business Partners are expected to 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.

### **Environmental protection**

#### Licenses and permissions

Business Partners are required to comply with 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

Business Partners are expected 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 minimize generation of solid waste, wastewater and air emissions.

#### Greenhouse Gas Emissions and Energy Consumption

Business Partners should look for cost effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

#### Product content restrictions

Business Partners are required to adhere to all applicable laws, regulations regarding prohibition or restriction of specific substances, including labeling for recycling and disposal, e.g. REACH regulation, RoHS restrictions, CE marking etc.

**Personal data protection**

Business Partners are required to respect the personal data protection and undertake 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, Business Partners should establish strict procedures for the protection of personal data throughout its spectrum of activities.

**Supplier acknowledgement**

I, the undersigned, on behalf of the company ..... acknowledge to have read and understood the terms and conditions expressed in the Supplier Code of Conduct and confirm that the company adheres and commits to compliance with the Code.

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

Signer's name and title: \_\_\_\_\_

Signature and stamp:

Date: \_\_\_\_\_

**Validity of the Code of Conduct**

Cenergy Holdings 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 Cenergy Holdings will inform their Business Partners and expect them to accept those reasonable changes.

For Cenergy Holdings

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A. Alexiou  
CEO