

HEC – Supplier Code of Conduct

1. Scope and Applicability

This Supplier Code of Conduct (“Supplier Code”) sets out the principles and standards expected from all suppliers, subcontractors, consultants, service providers, business partners and other third parties representing or working on behalf of Hellenic Environmental Center S.A. (“HEC”), whether through outsourcing, procurement or other business activities.

The Supplier Code applies to all suppliers and business partners engaged in providing goods or services to HEC and forms part of HEC’s approach to responsible and sustainable business relationships.

Suppliers are expected to communicate the principles of this Supplier Code, as applicable, to their employees and relevant subcontractors engaged in activities performed for or on behalf of HEC.

Suppliers shall comply with all applicable laws and regulations and, where the requirements of this Supplier Code are stricter than applicable legal requirements, suppliers are expected to apply the higher standard, to the extent permitted by applicable law.

2. Values & Principles

HEC expects its suppliers and business partners to conduct their activities consistently with the values and principles reflected in HEC’s Code of Conduct & Ethics.

Credibility & Responsibility

Suppliers are expected to act responsibly in all areas of their operations, including Environment, Society and Corporate Governance.

Sustainable Development & Innovation

Suppliers are encouraged to support sustainable development, environmental protection, resource efficiency and responsible business practices.

Integrity

Suppliers shall conduct their business relationships with HEC with transparency, accountability and integrity.

Suppliers shall avoid situations in which personal interests or personal gain could improperly influence business decisions involving HEC.

Efficiency & Commitment

Suppliers are expected to demonstrate commitment to fulfilling their contractual obligations and to meeting agreed quality, environmental, health and safety and other applicable requirements.

Dedication, Care & Respect

Suppliers are expected to respect the environment, their employees, HEC employees, business partners and society as a whole.

3. Business Ethics

Business ethics are essential for sustainable development. HEC expects suppliers to conduct their activities fairly, transparently and ethically and to avoid practices that distort fair competition or hinder economic and social development.

Suppliers shall:

- Comply with applicable competition and anti-trust laws.
- Not exploit a market position in violation of applicable laws.
- Compete fairly based on the value and quality of their goods and services.
- Not offer, request or accept undue payments or other improper advantages.
- Conduct business relationships honestly and transparently.

Anti-Bribery & Anti-Corruption

Bribery, kickbacks and facilitation payments are strictly prohibited.

Suppliers shall comply with all applicable anti-bribery and anti-corruption laws and regulations and shall not offer, promise, authorize, request or accept anything of improper value intended to influence a business decision or obtain an improper advantage.

4. Avoidance of Conflicts of Interest

Suppliers shall avoid situations that may create an actual, potential or perceived conflict of interest in their relationship with HEC.

Suppliers are expected to:

- Avoid situations in which personal relationships affect or may appear to affect objective business decisions.
- Disclose relevant conflicts of interest to HEC.
- Ensure that outside activities do not improperly influence their obligations towards HEC.
- Not use business opportunities or information obtained through their relationship with HEC for improper personal gain.
- Not offer or accept inappropriate gifts, favors or entertainment intended to influence business decisions.

5. Compliance with Laws and Regulations

HEC prioritizes compliance with all applicable laws and regulations.

Suppliers shall comply with all laws and regulations applicable to their activities and to the goods and services provided to HEC, including applicable requirements relating to labor, human rights, health and safety, environmental protection, data protection, business ethics and trade restrictions.

6. Privacy & Data Protection

Suppliers shall respect privacy and protect personal information obtained, processed or otherwise handled in connection with their relationship with HEC. Suppliers shall:

- Collect and process personal data only for legitimate purposes.
- Limit the collection and retention of personal data to what is necessary.
- Protect personal data against unauthorized access, use, disclosure or loss.
- Comply with applicable data protection and privacy laws and regulations.

7. Whistleblowing

HEC encourages openness and integrity and expects suppliers to support the reporting of suspected misconduct.

Suppliers are expected to promptly report to HEC any suspected violation of this Supplier Code, applicable law or ethical requirements relating to their relationship with HEC.

Reports should be treated confidentially and handled appropriately.

HEC does not tolerate retaliation against persons who raise concerns in good faith.

8. Human Rights & Labor Standards

Suppliers shall respect internationally recognized human rights and applicable labor standards and shall:

- Prohibit forced labor , child labor, human trafficking and abusive treatment.
- Provide a workplace free from discrimination and harassment.
- Respect dignity, equal opportunities, freedom of association and applicable labor rights.
- Comply with applicable requirements on working hours, rest periods, wages, overtime and benefits.
- Ensure compliance with applicable health and safety laws and regulations.

9. Supplier & Subcontractor Relations

HEC awards contracts to partners aligned with its values and expects suppliers to maintain responsible business practices throughout the activities performed for HEC.

Suppliers shall ensure that relevant subcontractors engaged in performing services for HEC are informed of and, where applicable, comply with the principles and requirements of this Supplier Code.

Suppliers shall treat their own business partners and employees fairly and without discrimination.

HEC may evaluate suppliers, where appropriate, against applicable contractual, environmental, social, health and safety and ethical requirements.

10. Onboarding & Training

Suppliers shall ensure that personnel assigned to activities for HEC have the qualifications, licenses, competencies and training required for their duties and applicable legal requirements.

Where relevant to the activities performed for HEC, suppliers shall provide appropriate occupational health and safety training and ensure that personnel are adequately prepared to perform their duties safely.

Suppliers shall provide appropriate personal protective equipment where required.

11. IT Security & Digital Conduct

Where suppliers have access to HEC information, systems or digital platforms, they shall:

- Use such systems responsibly and ethically.
- Protect HEC information against unauthorized access, disclosure, alteration or loss.
- Not misuse HEC email, digital systems or other electronic resources.
- Not disclose confidential information without authorization.

Suppliers shall comply with applicable information security and data protection requirements.

12. Environmental & ESG Commitment

HEC is committed to reducing its environmental footprint through energy efficiency, waste reduction and sustainable practices.

Suppliers are expected to conduct their activities responsibly and to comply with applicable environmental laws and regulations.

Suppliers should, as applicable to their activities:

- Prevent and minimize environmental impacts.
- Promote efficient use of energy and resources.
- Reduce waste and support responsible waste management.
- Prevent pollution and appropriately manage environmental risks.
- Promote sustainable practices in their operations and supply chain.
- Provide relevant environmental information to HEC where required by applicable contractual or legal requirements.

13. Environmental Incidents and Notifications

Suppliers shall promptly notify HEC of any significant environmental incident, release, spill, pollution event, regulatory breach or other environmental event that may affect HEC, its operations, personnel, assets or reputation.

Suppliers shall immediately take appropriate measures to control, contain and mitigate the incident, comply with applicable reporting obligations and cooperate with HEC in any investigation and corrective actions

14. Sanctions Compliance

HEC is committed to complying with all applicable economic sanctions, trade restrictions and restrictive measures imposed by the United Nations, the European Union and other applicable authorities.

Suppliers shall comply with applicable sanctions requirements and shall not knowingly engage in or facilitate transactions or business relationships prohibited by applicable sanctions.

Suppliers shall promptly notify HEC of any suspected violation of applicable sanctions requirements or any attempt to circumvent such measures.

15. Compliance, Monitoring & Corrective Actions

Suppliers are expected to comply with this Supplier Code and to provide information reasonably required by HEC to verify compliance with applicable requirements.

HEC may, where appropriate and in accordance with contractual arrangements, evaluate suppliers' compliance with relevant environmental, social, labor, human rights, health and safety and ethical requirements.

Where non-conformities or areas for improvement are identified, HEC may request the supplier to implement appropriate corrective actions within an agreed timeframe.

Serious or repeated violations of this Supplier Code may be considered in HEC's supplier relationship and contractual decisions, subject to applicable contractual terms and legislation.

16. Reporting & Cooperation

Suppliers shall cooperate with HEC in good faith in relation to reasonable requests concerning compliance with this Supplier Code and applicable contractual requirements.

Where requested, suppliers shall provide accurate and relevant information or supporting documentation concerning their environmental, labor, human rights, health and safety or ethical practices.

17. Supplier Commitment

Suppliers are expected to acknowledge and comply with this Supplier Code of Conduct as part of their business relationship with HEC.

By signing or otherwise formally acknowledging this Supplier Code, the supplier confirms that it has reviewed the requirements and commits to conducting its activities in accordance with the principles and standards set out herein.

Where applicable, suppliers are expected to communicate the relevant requirements of this Supplier Code to employees and subcontractors involved in activities performed for HEC.

18. Related Policies

HEC maintains specific policies and procedures covering matters addressed in its Code of Conduct & Ethics and related management systems.

Suppliers shall comply with applicable contractual requirements, policies, procedures and instructions communicated by HEC that relate to the goods or services provided.

This Supplier Code shall be read in conjunction with the applicable contractual terms and requirements of HEC.