

	SUPPLIERS' CODE OF ETHICS	Initial Issue
	REVIEW: Operations / Procurement	Date of Initial Issue: December 2022

SUPPLIERS' CODE OF ETHICS
LAMDA GROUP

DECEMBER 2022



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1 INTRODUCTION

- 1.1** This Suppliers' Code of Ethics (hereinafter "Code of Ethics" or "Code") contains the ethical principles that must govern the conduct of any suppliers, contactors, service providers and consultants (the "Suppliers") that enter into a contractual relationship with Lamda and which must be expressly accepted by them prior to commencing such contractual relationship. All references to "Lamda" include the relevant contracting entity and all other Lamda group companies that benefit from the goods and services being provided.
- 1.2** Both the Code of Ethics, as well as the Code of Conduct of the Group, reflect the relevant Corporate Principles and Values of Lamda.


2 GENERAL REQUIREMENTS

- 2.1** The Code of Ethics's purpose is, among others, to promote, safe and fair working conditions as well as the responsible management of social, ethical and environmental issues in Lamda's supply chain. The provisions of the Code of Ethics are without any prejudice to additional conditions or requirements as those may be imposed by the applicable law or by the respective contract with each supplier, which shall apply in all cases.
- 2.2** Suppliers shall ensure that their own suppliers and subcontractors are subject to principles of conduct equivalent to those established in this Code of Ethics.
- 2.3** Suppliers shall provide Lamda with reasonable access to all relevant information and premises for the purposes of assessing performance against this Code of Ethics and use reasonable endeavours to ensure that sub-tier suppliers do the same.
- 2.4** A breach of this Code may be considered to be a material breach of contract with Lamda, and Lamda accordingly reserves all its legal rights and remedies in respect of any such breach. Suppliers are expected to monitor the compliance of their activities with the standards of this Code of Ethics and take corrective actions where necessary.

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3 HUMAN RIGHTS AND LABOUR PRACTICES

- 3.1 Suppliers will treat all employees with respect and dignity, safeguarding their human rights and shall prohibit any abuse (physical or verbal) or other harassment as well as any threats or other forms of intimidation.
- 3.2 Suppliers shall pay their employees in accordance with the provisions of applicable laws, including minimum wages, overtime and social security benefits. Suppliers shall not use deductions from wages as a disciplinary measure and shall pay the employees in a timely manner.
- 3.3 Suppliers must take steps and adopt all measures within their organisation required to eliminate all kinds or forms of forced, bonded, compulsory labour, slavery or human trafficking, that is to be understood as any work or service demanded from an individual under threat of any negative consequence if such work or service is not provided.
- 3.4 Suppliers shall expressly reject the use of child labour within their organisation, shall respect the minimum hiring age limits in accordance with applicable law, and shall have adequate and reliable mechanisms in place to verify the age of their employees.
- 3.5 Suppliers shall respect the rights of employees to join or not in trade unions or similar representative bodies and their rights to collective bargaining to the extent permitted by applicable law. Suppliers shall allow open communication and direct engagement between its employees and management in building employee relations and for the resolution of any issues.
- 3.6 Suppliers must reject all discriminatory practices with regards to any condition or circumstance in employment matters such as hiring, employment terms, remuneration, access to training, promotion, employment termination, retirement procedures or decisions, that is based on race, colour, ethnicity, nationality, age, religion, sexual orientation, political affiliation, trade union membership, disability, medical condition, social origin or social status.
- 3.7 Suppliers shall implement measures that promote respect for the personal life of their professionals and facilitate the achievement of an optimal balance between the latter and work responsibilities, with respect for applicable laws and local practices, and shall not in any case eliminate the measures established, at the time of becoming a supplier of Lamda. Supplier shall ensure working hours of Supplier's employees do not exceed the maximum set by local law.

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4 CONFLICT OF INTEREST

- 4.1** Suppliers must maintain mechanisms ensuring that the Supplier's independence of action and full compliance with applicable law will not be affected in the event of a possible conflict of interest between the interest of the Supplier and the personal interest of any of its professionals.

5 CONFIDENTIALITY


- 5.1** Information owned by Lamda and disclosed to the supplier shall, as a general rule, be deemed to be confidential information. Suppliers and all their respective professionals shall be responsible for adopting adequate security measures to protect such confidential information. The information provided by suppliers to their contacts within Lamda shall be true and shall not be given with the intent to induce any deception.

6 PROTECTION OF PERSONAL DATA

- 6.1** Supplier shall comply with Data Protection Regulation, such as GDPR (General Data Protection Regulation) and any other applicable law, as well as opinions, decisions or guidelines issued by the competent authorities.

7 ANTI-BRIBERY, ANTI-CORRUPTION AND INDIVIDUAL CONDUCT

- 7.1** Suppliers shall engage in their commercial relationships in conformity with principles of business ethics and transparent management and adhere to the strictest rules of ethical and moral conduct including international treaties and laws applicable in the countries of their operation, by establishment of adequate procedures required in that respect. To that effect, Suppliers shall respect the Group's Anti-Corruption Policy.
- 7.2** Suppliers shall not directly or indirectly promise, offer or pay any bribe or money or valuable property in a corrupt manner in order to (i) facilitate transactions or other improper payments to any third party or to any professional of Lamda in relation to their contracts therewith; (ii) influence an act or decision of a third party or a professional of Lamda; (iii) obtain an undue advantage for Lamda; or (iv) induce a third party or a professional of Lamda to exercise influence over the act or decision of a public officer.

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- 7.3** Suppliers shall not promise, offer or deliver gifts or objects of material value, of any kind, to persons or entities that are officials or professionals of government administrations for the purpose of or in relation to the formalisation of their contracts with Lamda.
- 7.4** Suppliers are encouraged to have an anti-bribery policy that sets out the principle of zero tolerance to any form of bribery or corruption within their organisation, including facilitation payments and ensure its employees, contractors and sub-contractors are aware of its anti- bribery policy and how to comply with its requirements.
- 7.5** Suppliers shall act in accordance with all applicable laws and international standards on fraud and money laundering and shall not do or omit to do anything likely to cause any party to be in breach of any of such laws or standards.

8 HEALTH AND SAFETY

- 8.1** Suppliers shall provide a healthy and safe working environment for employees, contractors, partners or others who may be affected by Supplier’s activities, in accordance with international standards and national laws and shall put in place mechanisms to ensure that health and safety obligations are communicated and applied to parties under its control.
- 8.2** Suppliers shall ensure facilities and amenities, including employee accommodation where provided by Supplier, shall be hygienic, safe and meet the basic needs of employees.
- 8.3** Suppliers shall ensure the protection of their professionals, avoiding their overexposure to chemical, biological or physical hazards or to tasks demanding excessive physical effort at the workplace.
- 8.4** Suppliers shall have systems and training to prepare for and respond to accidents, health problems and foreseeable emergency situations. Suppliers shall have means and procedures in place for recording, investigating and implementing learning points from accidents and emergency situations.

9 ENVIRONMENT

- 9.1** Suppliers shall comply with relevant legislation and international standards applicable and ensure reasonable practices for managing environmental impacts are in place based on the products and services supplied. They shall

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obtain, maintain and keep in validity all necessary environmental permits (e.g. waste management, transportation), approvals and registrations.

- 9.2** Suppliers shall identify and manage those substances and other materials that present a hazard when released into the environment in order to ensure that they are handled, transported, stored, recycled or reused, and disposed safely and in compliance with applicable regulations. All waste materials, waste water or emissions having the potential to adversely affect the environment shall be appropriately managed, controlled and treated.

10 WHISTLEBLOWING

- 10.1** Within the framework of good corporate governance and regulatory compliance, Lamda has developed a Whistleblowing Policy that implements specific principles and directions in order to strengthen the integrity, transparency and accountability, as well as to safeguard its interests and reputation. Suppliers are strongly advised and encouraged to report any instances of illegal or unethical behaviour or breaches of this Code of Ethics (in relation to the goods and services being provided to Lamda) in confidence, via the following channels of communication:

Email: whistleblowing@lamdadev.com

Online: <https://lamdadev.sec.fraudline.gr/>

- 10.2** Suppliers shall inform their personnel, sub-contractors and other partners about the Whistleblowing Policy of the Group, which is accessible via the website "lamdadev.com". They shall also inform any interested party that the Whistleblowing mechanism is strictly confidential and that the ability to submit reports anonymously or not is provided via the above-mentioned channels..