

## VITAE INVESTMENT - DEVELOPMENT S.A.

### CODE OF ETHICS FOR SUPPLIERS

VITAE S.A. functions in such a way as to ensure its economic, social and environmentally friendly operation and the company is committed to providing high-level services by observing the quality procedures of its services (relevant, among other things, to the applicable "Quality - Environment - OHS Policies" of VITAE S.A.).

This Code applies to all partners and suppliers of VITAE (hereinafter "the Suppliers") and it is an integral part of every cooperation between VITAE and its suppliers, in such a way that the latter are committed to the observance of the principles of corporate responsibility and the obligations deriving from this Code.

The suppliers of VITAE, whether of products or services, beyond the absolute observance of their contractual obligations as well as their compliance with the applicable laws, provisions and regulations in all the countries in which they operate, are additionally committed to observe the following principles:

#### **1. Human Rights:**

- I. To support, respect and ensure through their activities the protection of universally declared human rights.
- II. To fully comply with the national and EU labor laws and rules and generally those of the countries in which they operate, providing equal opportunities in the workplace and taking appropriate and in all respects effective measures to deal with the violation of any kind of human rights, cooperating in investigations related to violations of the above rights, laws and contracts.
- III. To defend the freedom of association and the right to collective bargaining.
- IV. Not to use or support child labor in any way and any form of forced or compulsory labor.

- V. To encourage the elimination of discrimination in recruitment and employment.
- VI. To ensure equal employment and promotion opportunities for their staff and to comply with the provisions applicable contextually regarding the working hours, wages and benefits of their employees.

## **2. Protection of the Environment:**

- I. To follow responsible environmental practices for the protection of the environment with the main objective of preventing and strengthening environmental responsibility by complying with the applicable environmental laws and provisions related to hazardous materials, emissions, gaseous and liquid waste, as well as legal requirements and industry standards regarding the prohibition or restriction of certain substances in the manufacture or design of products.
- II. To comply with the regulations in force for product and packaging labeling, material content, safe handling, transport, storage, use, reuse, recycling and disposal.
- III. To have all the required environmental permits and approvals available on request.
- IV. To encourage the development and dissemination of technologies that are environmentally friendly.

## **3. Fight against Corruption:**

- I. To refrain from and demonstrate zero tolerance for any form of corruption, including - without limitation - extortion, fraud, active or passive bribery, "facilitation payments", as well as money laundering.
- II. To take all the prescribed measures to prevent money laundering within their sphere of influence.

- III. To make donations and contributions in accordance with the applicable legislation.
- IV. To provide employees with easily accessible and efficient procedures for submitting and resolving complaints.
- V. To avoid conflicts of interest that may lead to risks of corruption.

**4. Protection of Competition:**

- I. To respect the rules of free and fair competition in their business relationships and activities.
- II. Not to engage in actions, practices and behaviors of unfair competition.
- III. To respect all applicable trade laws, as well as the sanctions and restrictions imposed from time to time by Greece, the EU, the UN or other international organizations.
- IV. To disclose to VITAEL details and information about any conflict of interest.

**5. Protection of Personal Data:**

- I. To comply with all applicable data protection laws and all the specific requirements for data protection and security throughout the range of their activities.
- II. To establish clear, specific and strict procedures for the protection of personal data.
- III. To respect the intellectual property rights of any legal and/or natural person, including those of VITAEL, and take appropriate measures to protect the data and information provided to them as confidential.
- IV. Finally, if requested, Suppliers undertake the obligation to provide VITAEL with all the data documenting their compliance with this Code as well as to share any case of non-compliance on their part without delay.

Supplier Declaration

The undersigned (name and title of signee) .....  
..... on behalf of the company  
..... I declare that I have received a copy of VITAEAL's Code  
of Ethics for Suppliers and I confirm that the company I represent adheres to and  
undertakes to comply with said Code.

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

Signature and stamp: