



**ALUMAN S.A.**  
ALUMINIUM SLUGS MANUFACTURING

**CODE OF**  
**CONDUCT**

for the company

**ALUMAN S.A.**

## **1. Introduction**

Since its establishment, ALUMAN SA (hereinafter referred to as "the Company") has implemented business practices governed by integrity, reliability, honesty, transparency, fair conduct in transactions, and full compliance with applicable legislation..

The Company's Code of Ethics (hereinafter "the Code") sets out the general principles that define responsible business behavior and the ethical rules that all employees and associates of ALUMAN SA must follow. Additionally, this Code reflects the commitments of ALUMAN SAs management to its personnel.

The Code covers all activities of ALUMAN SA and binds its employees, regardless of their hierarchical position, as well as all external providers of the Company.

## **2. The Commitment of the Management**

The Management of ALUMAN SA, an aluminum processing industry, always aiming for customer satisfaction, respect for its human resources, and ensuring excellent working and collaborative conditions, protection of the environment, and harmonious coexistence with Greek society and the societies of the countries in which it operates, applies Corporate Responsibility and Sustainability principles, in accordance with the Aluminum Stewardship Initiative (ASI).

The goal of ALUMAN SA is to monitor and comply with the legislative and other requirements arising from the current Greek and Community legislation, principles and rules, and from the Guiding Principles of the Aluminum Stewardship Initiative (ASI).

- ✓ Through the present Code of Ethics, the Administration is committed to:
- ✓ Respect for human rights, the rights of employees, and the avoidance of any form of discrimination.
- ✓ Ensuring excellent working conditions and ensuring the protection of the health and safety of its employees, partners, the local community, and the public.
- ✓ Protecting the environment.
- ✓ Reducing the company's impact on climate change.
- ✓ Compliance with applicable legal and other requirements regarding its operation, this Code, and systematic monitoring and compliance with labor and accounting laws and industry conventions, as well as with intellectual property, data protection, and transparency laws.

- ✓ Providing excellent customer service.
- ✓ Business continuity and economic development of ALUMAN S.A.
- ✓ Fighting corruption and bribery.
- ✓ Supporting the local community.
- ✓ Protecting personal data and intellectual property of personnel.
- ✓ Not cooperating with suppliers located in conflict-affected areas or high-risk areas.
- ✓ Not intervening in areas of global conflict

The management of the company is committed to active participation of all and the provision of resources at every level (human, material, financial) that will contribute to continuous improvement.

The management promotes and supports consultation between employees and their representatives on issues related to this Code. It seeks the opinions and consultation of all interested parties.

### **3. Respect for human rights, workers' rights, and the avoidance of any form of discrimination.**

The company promotes equal opportunities and fights against discrimination. We prohibit any kind of discrimination during recruitment, employment, and remuneration. We comply with the requirements of international human rights regulations as reflected in the conventions of the International Labor Organization, the United Nations Convention on the Rights of the Child, and the Universal Declaration of Human Rights.

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The clear and understandable signature of employment contracts is applied to all employees, and the use of undeclared and uninsured labor is excluded. ALUMAN SA respects the right of its personnel to live with a decent wage and fully complies with the legislation on wages, working hours, and overtime employment. It competes fairly in compensating its employees without any form of discriminatory treatment. Overtime work is of a voluntary nature.

The company prohibits the use of forced or compulsory labor. It also explicitly prohibits the involvement or support of any act of human trafficking, fully complying with the laws against

human trafficking and modern slavery, and does not work with companies that knowingly support these practices. In the event of such incidents being detected by its Supply Chain, it guides companies to comply with the above laws.

It defends workplace equality and equal opportunities regardless of gender, family status, the presence or absence of dependents, religious beliefs or political position, nationality, age, any special needs, health issues, or peculiarities. Our company supports the Empowerment of Women.

It ensures equal treatment of all personnel, without exception, with dignity and respect. There is zero tolerance for physical punishment, mental or physical abuse of staff, and no harsh or inhumane treatment, including possible harassment against women employees in our company, is acceptable or tolerated.

The senior management ensures at minimum the following:

- Job postings and advertisements, manuals, leaflets, educational materials, notes, posters, and other communication media do not introduce discrimination.
  - Incidents of discrimination are documented, examined by the organization, and lead to a documented plan of restoration.
  - All personnel have the same opportunity to apply and be considered for the same positions.
  - All personnel are treated fairly regarding privileges, benefits, leaves, rest areas, and canteens.
- Employees who believe that their workplace does not conform to the above principles are encouraged to report their concerns to the human resources department or management without any hesitation

The company combats any form of violence or workplace harassment - advocating zero tolerance for violence - and protects employees from any related behavior within the business. Additionally, ALUMAN SA supports employees who experience domestic violence, protecting their employment within the company, through any means or adjustments available.

Employees can express concerns or raise issues directly to the company's Director of Human Resources, who is defined as the "point of contact" for such incidents. A specific and universally understood process is followed for the internal handling of harassment behaviors.

The company explicitly prohibits child labor and the hiring of individuals below the legal age of employment. It is the company's policy not to work with suppliers who use child labor in any of their own or subcontractors' facilities.

ALUMAN SA upholds the right to unionize, collective action, and collective bargaining for all its employees and negotiates in good faith.

The company upholds impartial evaluation and management of its personnel and avoids using disciplinary practices when the principles of the company regarding quality, environment, health and safety, transparency, and corporate responsibility are not violated.

#### **4. The provision of excellent working conditions and the assurance of protection of the health and safety of its employees, partners, local community, and the public.**

ALUMAN SA is committed to the health and safety of all individuals affected by its activities, including employees, contractors, and the public, and ensures a healthy and safe workplace for its employees. It complies with legal and other requirements, the principles of the Certified Health and Safety Management System according to ISO 45001:2018, and the commitments outlined in the Policy for Health and Safety at Work. All of its employees are responsible and committed to contributing to a safe working environment, promoting healthy work behaviors, and operating in an environmentally responsible manner.

The company is committed to providing a safe and healthy work environment and takes effective measures to prevent potential incidents of health and safety, as well as work-related injuries or illnesses that arise from, are related to, or occur during work.

The company strives to minimize or eliminate, to the extent reasonably practicable, the causes of all hazards in the work environment, based on the legislation concerning Health and Safety at Work.

The company evaluates all the risks related to Health and Safety at Work and develops inspections and action plans, to ensure that all reasonable measures are taken to eliminate or reduce risks.

When risks remain even after efforts have been made to effectively minimize or eliminate their causes, the organization provides personnel with appropriate personal protective equipment (PPE) at its own expense.

In case of a work-related injury, the organization provides first aid and assists the employee in rehabilitation and subsequent medical care.

#### **5. Protection of the environment and reduction of pollutants**

ALUMAN SA complies with the requirements of the legislation and environmental permit, and is committed to protecting the natural environment, including pollution prevention, by preventing any harmful change and degradation that could be caused by our company's operations. The company adheres to a Certified Environmental Management System in accordance with ISO 14001:2015 Standard and applies the commitments referred to in its Environmental Management Policy.

Its goal is the rational management of natural resources, the minimization and rational management of its generated waste, and the parallel increase in recyclable materials, compared to those disposed of.

ALUMAN SA is committed to reducing the impact of the company on climate change. Through Life Cycle Assessment and Annual Carbon Footprint Analysis, it develops actions to reduce the impacts of its activities on climate change.

## **6. Compliance with Applicable Legislation.**

The Company always complies with the current legislation and the operating principles governing it in each region or country where it operates.

Its employees and executives are obligated to act ethically in every aspect of their business activities and to maintain high standards of honesty, integrity, reliability, and incorruptibility.

Additionally, they must comply with legal requirements and other requirements established by the company or accepted in writing by it.

## **7. The Excellent Customer Service, our Business Continuity, and our Economic Development**

The Human Resources of ALUMAN SA faithfully adheres to the documented Quality Policy and the documented and Certified Quality Management System of the company in accordance with the ISO 9001:2015 Standard.

The company's main concerns are:

- the procurement of reliable products of consistent quality with timely delivery, that is, satisfying the needs and expectations of its customers.
- the production of products on the first attempt, at the lowest possible cost and improving the level of quality from batch to batch.
- responding to emergency incidents that may affect the company's operation by creating contingency plans and conducting periodic response exercises to ensure our business continuity.
- assessing and evaluating business risks, aiming for their proper and timely management and limiting financial losses.
- achieving positive economic results and maintaining the trust of the shareholders.
- immediate availability of products, functions, and services.

ALUMAN SA expects its employees to respect and protect the company's property and not use it inappropriately.

## **8. Conflict of Interest**

The employees of ALUMAN SA should not allow their professional transactions to be influenced or appear to be influenced by personal or family interests. Conflict of interest may arise if an employee or a family member engages in an act or presents an interest that objectively makes it difficult to perform their duties, or if they accept inappropriate personal benefits as a result of their position in the company ALUMAN SA.

Employees should be cautious about gifts or other benefits offered to them by individuals who wish to cooperate with ALUMAN SA and should not accept objects or other gifts of significant value that are offered to them with the aim of influencing their judgment.

## **9. Confidential Information**

Confidential information is information that has not been disclosed or made available to the general public. Employees who have access to confidential, privileged, or proprietary information about the business activities of ALUMAN SA must not disclose it to third parties or use it for their personal benefit (or the benefit of third parties). Confidential information should not be disclosed to third parties (even to the family members of the employee).

The company is committed to the safe and effective management of all kinds of elements, data, and information, as well as assets that may come to its knowledge during its collaboration with clients, managing them exclusively by competent individuals and based on ethics, without disclosing them to third parties for any reason.

Employees are prohibited, for personal benefit, from using the company's assets or patents, as well as any unpublished financial or data information.

## **10. Competition and Fair Conduct in Transactions**

The company and its employees are committed to operating within the framework of free and fair competition and to comply with the requirements of the legislation on monopolies and competition.

All employees of ALUMAN SA must refrain from any behavior that could be interpreted as undermining competition in the market in which our company operates.

## 11. Avoidance of Bribery and Corruption.

The company condemns any kind of corrupt professional behavior and any form of bribery.

ALUMAN SA Company:

- Prohibits Bribery. Any participation in bribery, corruption, facilitation payments, or any other illegal act will result in termination of the business relationship.

- Expects the same from all its suppliers and partners, to behave ethically and not to engage in any form of corruption, such as extortion, fraud, bribery, and the laundering of proceeds from illegal activities.

- Complies with anti-bribery legislation, which applies to the company and requires compliance from all interested parties.

- Prohibits employees from being shareholders in suppliers, customers or companies that produce or sell products competitive with ALUMAN SA.

- Adheres to a policy of gifts and donations.

- Participates in sponsorships only when they are reasonable and legal.

- Encourages the reporting of suspicions in good faith or on reasonable grounds, with confidentiality and without fear of reprisal.

When partners or other interested parties represent the company, they should, within the framework of their contractual obligations, agree to follow this policy. All their remuneration and expenses must be legal, reasonable, justified, and supported by evidence.

Conflicts of interest are not acceptable. It is a condition of employment that the management and employees do not engage in private business, politics, or philanthropy within the company without prior written consent of the management. It is a contractual requirement that all contractors and other interested parties declare to the company - before representing it in any way - if they have any real or potential conflict of interest with a specific client or other interested party or have been involved in situations of bribery.

The company does not participate in any political donations. In the case of a philanthropic donation, the written consent of the management is necessary.

The company allows only the receipt and provision of small value gifts and hospitality where this is reasonable and proportionate to a business relationship. Gifts and hospitality are avoided if there is a risk that they could be perceived as influencing decision-making.

Directors, staff, and contractors use confidential reporting channels to raise concerns and whistleblowing. However, all members of management are informed about how to address the concerns that have been raised to them, and it is a serious disciplinary matter not to report



or investigate such concerns. Under no circumstances will there be any form of retaliation for using the whistleblowing channel.

The ASI System has been implemented to prevent the company from engaging in any corruption processes and to handle and report cases that may require further investigation and action. This is fully supported by senior management.

## **12. Integrity and Honesty**

The Company is committed to operating with integrity. In carrying out their duties, the employees of the Company are always obliged to act with the highest honesty, integrity, and sincerity.

Employees in the Company must immediately notify the Company if they are accused of committing a crime and provide any additional information requested of them.

## **13. Alcohol and Drugs**

Consumption of alcoholic beverages during work hours or within the company premises is prohibited, unless it is a specific event approved by the management. In any case, possession, use, sale, trafficking, or offer of illegal drugs or other prohibited substances is prohibited during work hours or within the company premises. Additionally, it is prohibited to report to work or operate a company vehicle under the influence of alcohol or any illegal drug or prohibited substance.

## **14. Supporting the Local Community**

ALUMAN SA recognizes the importance of participation in the local community. It is committed to using locally produced materials and goods to the extent possible, without violating the principles of corporate social responsibility. It also uses local companies for the provision of services whenever possible.

The company participates in social actions aimed at the development of the local community and is welcome to consult with local stakeholders. It provides employment and economic opportunities to the local community and supports local employment and volunteering in local and national philanthropic institutions/organizations.

## **15. Procurement from conflict areas and high-risk areas**

As part of ALUMAN SA's commitment to responsible procurement, human rights, and sustainability, its goal is to ensure that the supply of minerals and metals from "conflict-affected and high-risk areas" does not finance, directly or indirectly, armed groups or cause or contribute

to human rights violations. The company is equally committed to continuing to support responsible mineral sourcing from areas affected by conflicts and high-risk areas.

It does not collaborate with suppliers located in "conflict-affected and high-risk areas" that are affected by armed conflicts with extensive violence, collapse of non-military infrastructure, vulnerable areas undergoing a post-war period, and areas with insufficient or non-existent governance and security that are characterized by extensive and systematic human rights violations.

The company requires its suppliers to have or establish effective due diligence processes, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, when procuring raw materials from areas affected by conflicts and high risks.

## **16. Safety of Installations**

The company has a zero-tolerance policy for human rights violations by security personnel.

The guidelines for security personnel emphasize that they should never intimidate or threaten employees in an attempt to force labor, regardless of what individual persons may ask from management.

Security personnel must be appropriately trained and licensed according to applicable laws. The company conducts an investigation into any illegal or abusive behavior by security personnel and may terminate contracts in cases of unacceptable behavior.

The company provides adequate and effective training of security personnel on its relevant principles and policies regarding appropriate behavior and the use of force. Security personnel are required to treat employees with respect and not to use tactics of intimidation.

The security personnel accept the Code of Ethics for Suppliers of ALUMAN SA.

## **17. Use of Social Media and Email**

All employees must be aware of the Principles governing their participation in Social Media (such as Facebook, blogs, Twitter, etc.) when referring directly or indirectly to the company.

Employees are required to use Social Media based on the Principles of Transparency, Responsibility, and Compliance with current international internet usage regulations. Workers must be aware that:

Communication with the Mass Media is the responsibility of specific individuals authorized by ALUMAN SA explicitly for this purpose.

In cases where they receive questions on corporate issues for which they are not explicitly authorized to respond, they should forward them to their Supervisor who will transfer it to the appropriate authorized person.

Employees should use email and the internet in the workplace exclusively for the purposes of the company. Access to websites unrelated to the company's purposes is strictly prohibited.

In cases where they receive questions on corporate issues that they have not been explicitly authorized to answer, they should pass them on to their supervisor, who will then pass them on to the appropriate authorized person.

Employees should use email and the internet in the workplace exclusively for company purposes. Access to websites unrelated to the company's objectives is strictly prohibited.

## **18. Corporate Governance**

- The corporate governance of the Company is based on the following principles:
- Integrity
- Sustainability
- Trust
- Profitability
- Growth

In this context, ALUMAN SA has adopted the following principles and practices:

- **Organizational chart and Detailed Assignment Determination of the Board of Directors and Committees.**

### ➤ **Board of Directors**

The minutes of the Board of Directors of the company describe the roles and responsibilities of the Board of Directors, which was elected by the General Assembly, as well as the Managing Director, who is appointed as the Chairman of the Board of Directors.

➤ **Managing Director**

Controls the Corporate Governance procedures

Conducts Risk and Opportunity Assessment

Approves the Company's Sustainability Report

➤ **Committee for the Audit of the Sustainability Report.**

This committee monitors and provides information on progress in sustainable development issues. It contributes to shaping and oversees the Sustainability Report.

➤ **Committee for Quality, Environment, Health and Safety, and Energy Review.**

This committee constitutes the Review Council in accordance with the requirements of ISO 9001:2015, ISO 45001:2018, ISO 14001:2015, ISO 50001:2018 standards.

➤ **Employees Committee for Health and Safety**

According to Law N3850/2010, this committee is elected by the employees every two years. It consults with the employees and conveys their observations to the Occupational Health and Safety Committee.

➤ **Occupational Health and Safety Committee.**

The Occupational Health and Safety Committee carries out meetings on OHS issues and contributes to the development and review of policies and objectives. It meets every 3 months and is attended by a representative of management, the safety officer, the occupational physician for health and safety issues, and workers' representatives for OHS.

➤ **Compliance and Complaints Investigation Committee.**

This committee investigates concerns and allegations that come from all interested parties (employees, customers, suppliers, members of the local community, etc.) and relate to issues such as discrimination, harassment, bullying, violence, workplace safety, violation of labor laws, violation of health and safety legislation, violation of environmental legislation, breaches of personal data, bribery, violation of gift policy, fraud, corruption, conflict of interest, accounting irregularities, embezzlement, antitrust violations.

➤ **Manager of Management Systems and his Deputy.**

They manage the documented information and issues of the Integrated Management System based on the requirements of the Standards it adheres to and on which the Company is certified.

- **Establishment of a Code of Ethics.**

By establishing and adhering to this code of ethics, the company performs its work by complying with the standards imposed by modern corporate governance aimed at enhancing the effectiveness of the rules for internal control.

- **Establishment of Communication and Reporting Channels**

Through the Channels of Communication and Complaints, employees and interested parties can report or raise concerns about issues related to the company's operations.

## **19. Compliance with the Code.**

It is the responsibility of all employees to read and comply with this code and to avoid behaviors that contradict its principles and may harm the company's reputation. We must all constantly ensure the uninterrupted and consistent application of the provisions of the code and avoid any violations of it.

## **20. Reporting illegal or unethical behavior.**

Employees are encouraged to openly address their Supervisors, Management or the HR Director and report any violations of the Code of Ethics that they perceive or become aware of.

To report an incident, an email must be sent to the integrity line at

[aluman.ethics@aluman.gr](mailto:aluman.ethics@aluman.gr).

This can be done by visiting the company's website at [\*\*www.aluman.gr\*\*](http://www.aluman.gr) and clicking on the **CONTACT US** tab, where the option **INTEGRITY LINE** leads directly to a page with instructions.

Personal information may be included or anonymity may be maintained to allow for full expression. In any case, identity will be strictly confidential. There will be no form of retaliation for using the reporting channel under any circumstances.

Finally, another way to report is through the complaints box located at the entrance of the factory at the electronic card reader point (employee clock).

When reporting an incident, as much detail as possible should be provided, including the date, time, location, and names of any witnesses or individuals involved. This will help to thoroughly investigate the matter.

Within 7 days of submission, a confirmation of receipt of the email will be sent by the Responsible for Receiving and Monitoring Complaints (R.R.M.C). Upon receiving the email, the Responsible for Receiving and Monitoring Complaints will immediately inform the Plant Manager of the factory and the Human Resources Manager , who will form an investigation committee consisting of the two aforementioned individuals and the responsible person of the relevant department. The committee will investigate the complaint thoroughly and take the necessary actions. To ensure complete transparency and information during the process, updates will be provided regarding the progress of the investigation and the final response.

The final response (depending on the nature of the complaint) will not exceed three months. (The three months only apply to serious complaints that require extensive investigation.) Employees are required to cooperate during the internal investigation of such cases.

Those who violate the Code are subject to disciplinary action, termination of employment, and a claim for compensation according to applicable legislation.

In order to ensure compliance with this Code of Ethics by the Company's Human Resources, the Company requires its Human Resources to become aware of the provisions set forth in this Code by visiting the Internet and the company's website where it will be posted and available.

## **21. Monitoring and Modifications of the Code.**

Each department is responsible for adhering to the Code of Ethics and internal regulations in its area of responsibility. In collaboration with Top Management, it annually reviews and evaluates the code to determine its alignment with the company's practices. It also monitors the code and updates it in case of changes affecting the company or the code, as well as compliance with legal requirements.

Every five years, the Code of Ethics is reviewed and updated.

The Code of Ethics was approved by the Administrative Board of ALUMAN SA and can only be amended or revoked by it. Any potential modifications or revocations are announced accordingly.