



SUPPLIERS' CODE OF CONDUCT

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CHAPTER 1 – INTRODUCTION

1.1 PURPOSE

The Bank, following its commitments in matters of corporate responsibility, as reflected in the Corporate Responsibility Policy, sets out with this Code the terms of cooperation and the evaluation criteria for its Suppliers in matters of corporate social responsibility, with the aim of broadening the definition and systematic application of social and environmental criteria in its procurement procedures.

In the context of applying best practices, it aims to establish, on the level of operation of the cooperating Suppliers, the following conditions:

- Consolidation of healthy competition by offering equal opportunities in tendering procedures.
- Support and enhancement of local communities through cooperation with local Suppliers, contributing to their social welfare and economic development, while reducing the environmental footprint, creating stable and long-term professional relationships.
- Encouragement of new, responsible Suppliers who advance social interest and protect the environment with their business conduct.
- Establishment of ethical business practices.
- Harmonization with the international standards, regulations and provisions of national legislation on labour and the environment.

1.2 APPLICABILITY

The provisions of this Code shall apply to the Bank's Suppliers, including their parent companies and subsidiaries.

In addition, Suppliers are responsible for the continuous information, training and compliance of their staff (who work for them regardless of the form of employment) with the provisions of this Code and undertake to make every effort to ensure compliance of their collaborating subcontractors.

1.3 COMPLIANCE

The Bank expects its Suppliers to comply with all relevant national laws and regulations, as well as with the provisions of this Code. The Bank develops appropriate mechanisms and procedures for monitoring and evaluating the Suppliers' compliance with the stipulated terms. Suppliers are required to respond to the Bank's evaluations and proposals.

The Bank reserves the right to amend the Suppliers' Code of Conduct in order to improve it. In this case, the Bank expects its Suppliers to accept these reasonable amendments.

1.4 CONTINUOUS IMPROVEMENT

The Bank acknowledges that meeting the standards set out in this Code is a dynamic process. In case Bank's Suppliers fail to comply with these standards, the Bank may develop advisory methods, means and practices for upgrading and improving their operation and activities. In case of non- commitment of the Supplier for adjustments and compliance in accordance with the provisions of the Code within a reasonable period of time or in case of failure to implement them, the Bank may terminate its cooperation and terminate the agreement between them.

1.5 APPLICATION

Acknowledgement of the Suppliers' Code of Conduct is a prerequisite for any procurement of goods or services. The acceptance and compliance of the Supplier with the Code is documented by its endorsement and annexing of the Code to the signed agreements. For procurement awards that are not accompanied by a Contract, given that the Suppliers' Code of Conduct is posted on the Bank's website, upon acceptance of the award the relevant Supplier must certify that it is aware of and accepts the terms and basic principles of the Code.

CHAPTER 2 – CORE PRINCIPLES

2.1 LABOUR - HUMAN RIGHTS

The Bank fully adopts the values enshrined in the United Nations Universal Declaration of Human Rights and the Core Labour Conventions of the International Labour Organization (ILO) and expects all its Suppliers to respect and uphold the human rights of employees.

Employment Practice

Work must be voluntary, provided as the result of free will and governed by the relevant EU directives and the applicable national legislation. Employees must be free to leave at any time after giving reasonable notice. Obligations towards employees, in terms of work and social security, arising from laws and regulations should not be avoided through the choice of alternative form of work such as part-time – temporary employment, rotation employment, subcontracting, apprenticeship programs, etc.

Treatment of Employees

All employees must enjoy fair and equal treatment. The Supplier must operate with dignity, respect and integrity in how it treats its employees and must respect their rights to private and family life. Any form of mental, physical, sexual or verbal abuse, threat or other form of intimidation is not acceptable to the Bank and is not allowed.

Prohibition of Discrimination

Any form of discrimination is unacceptable. The Bank prohibits and does not tolerate discrimination in the recruitment process, in the practices for employment and employee development based on race, colour, religion, sex, age, physical ability – disability, nationality, political beliefs, sexual orientation, union membership, marital status – pregnancy, in accordance with the Convention on Discrimination of the International Labour Organisation.

Education and Training

The Supplier ensures the continuous education and training of its employees for the benefit of the employees themselves and the Supplier, in order to maintain and improve the quality of their work.

Avoidance of Forced Labour

The Supplier should under no circumstances adopt any forced labour regime, in all forms of the hired services it uses. The Supplier is prohibited from retaining any official original identification document as a condition for employment. The Supplier must notify the Bank of the legal framework regarding the employment of any immigrants or convicts.

Minimum Employment Age

It is strictly forbidden to use or take up employment with persons under the minimum age in accordance with the Minimum Age Convention of the International Labour Organisation and the national legislation (i.e. 15 years or 14 years in some developing countries). Persons aged 15 to 18 may not be recruited to work in hazardous conditions which may impair their physical, mental or emotional development.

Working Time

The Supplier must ensure that the working hours, overtime and leave of employees are in full compliance with the applicable national legislation and the International Labour Organisation. In the absence of relevant national legislation, the Supplier may not require more than 60 hours of weekly work, while employees are entitled to at least one day of leave after six consecutive working days. Any overtime work must be compensated and voluntary.

Fees

The salary or wages must be at least in accordance with national legislation or the standards of the industry based on collective labour agreements (whichever is higher), including those relating to overtime work. In any case, wages or salaries must meet the basic needs of employees. Payment in kind is prohibited. The Supplier must not impose disciplinary or other forms of salary withholding unless this is reflected in the relevant collective labour agreement.

2.2 HEALTH AND SAFETY

Suppliers are responsible for the physical and mental health and safety of their employees in all aspects of work, and for taking measures to ensure the health and safety of third parties, while also focusing on risk prevention. Suppliers are not relieved of this responsibility in case the employees do not comply with their obligations, nor in case the tasks of protection and prevention of occupational risk have been assigned to a safety technician and/or occupational physician.

Working Environment

The Supplier must provide conditions of health and safety in the working environment in accordance with international standards and the relevant legislation. Therefore, it must ensure that its facilities provide access to drinking water, have adequate lighting, ventilation, temperature, sewerage and are adequately maintained. Moreover, if required, personal protective equipment must be provided free of charge using appropriately designed workstations.

Accommodation

In case accommodation is provided to employees, it must be constructed and maintained in accordance with the applicable laws - regulations and must be clearly separated from the factory and the production area. The Supplier must respect the privacy of the employees and the dormitories must be clean, safe, with sufficient space, heating, ventilation, with free entry and exit, access to drinking water and clean facilities for the preparation - storage of food and hygiene facilities.

Emergency Response

The Supplier must be prepared to respond to emergencies. It must provide all employees with information on evacuation procedures and relevant training, through repeated drills, on first aid, fire safety, identification of emergency exits and on responding to serious and imminent danger in general.

Quality and Safety

All products and services provided by the Supplier to the Bank must meet the quality and safety criteria of international standards as well as the specifications and requirements of the Bank.

Health and Safety Management System

The development and maintenance of a health and safety management system and policy based on international standards (such as the OHSAS 18001) are encouraged and positively assessed in the evaluation of Suppliers.

2.3 ENVIRONMENTAL RESPONSIBILITY

The Bank, being particularly sensitive to environmental responsibility matters, expects its Suppliers to comply with all applicable legal requirements for the environment, demonstrating continuous qualitative and quantitative improvement in their performance in environmental protection matters. In addition, the Supplier is expected to seek and support innovative solutions in products and services that offer environmental and social benefits.

Environmental Licensing

The Supplier must apply the environmental protection legislation, obtain and keep all the necessary licenses and certifications, be constantly informed of the best practices, so that it may operate at any time in accordance with the applicable legal framework.

Environmental Management System

The development and maintenance of an environmental management system and policy based on international standards (e.g. ISO 14001), in order to identify, control and ultimately minimize environmental impacts, are encouraged and positively assessed in the evaluation of Suppliers.

Hazardous Materials and Product Safety

The Supplier must identify any hazardous materials and substances, ensure their safe handling, disposal, transport, storage, recycling, re-use and deposition. The Supplier must fully comply, on the one hand, with the applicable laws and regulations related to hazardous materials, chemicals and other substances, and, on the other hand, with the restrictions and safety requirements of the products. All employees, under the responsibility of the Supplier, must be informed and trained on product safety practices.

Consumption of Resources - Pollution Prevention - Minimization of Waste

The Supplier, using appropriate practices, must optimise the consumption of natural resources, including energy and water. It must also demonstrably improve its environmental performance in pollution prevention and in the minimization of solid and liquid waste, gas emissions and noise. Before the final disposal of liquid and solid waste, the Supplier must proceed to their characterization and proper handling in accordance with the applicable laws and regulations.

2.4 INTEGRITY, ETHICS AND BUSINESS CONDUCT

The Bank considers integrity, ethics and credibility in its relations with all stakeholders as basic prerequisites for any sustainable business. Therefore, it expects the Supplier to comply with all moral laws and regulations of international trade.

Business Ethics

The Supplier must operate based on the principles of business ethics. The Supplier is strictly forbidden, directly or indirectly, from any exhortation, offer or promise of benefit, in order to gain or maintain any business or other advantage.

Report of Conflict of Interest

The Supplier must submit a relevant report to the Bank regarding any situation that may appear as a conflict of interest.

Intellectual Property Protection

The Supplier must take appropriate measures to protect and maintain all information about the Bank and its partners. This information shall be treated as confidential, shall be used only in cases where it is specifically stipulated under its contractual obligations and shall not be disclosed to third parties. In case of subcontracting, the exchange of confidential information must be carried out upon the written consent of the Bank.

Information - Entries

The Supplier must keep transparent and up-to-date records - books, with all the information (structure, professional activity, financial data, certifications, procedures, etc.) that document its compliance with all applicable laws, regulations and business practices.

Origin of Raw Materials

The Supplier must be able to reveal all possible sources of origin of the raw materials of the products produced. The Bank reserves the right, if deemed appropriate, to ask the Supplier to record and disclose the supply chain of its products in order to determine Supplier's compliance with the applicable legislation.

Complaints Management

Suppliers must have an appropriate mechanism for the submission, recording, management and monitoring of complaints, while taking care to resolve them in a discreet and confidential manner.

CHAPTER 3 – REPORTS PROCEDURE

Breaches of the Suppliers' Code of Conduct must be reported through the approved available means of communicating with the Bank that ensure the required confidentiality and protection of the reporting person.

Reports may be submitted as follows:

- Via phone to the dedicated number +30 210 326 2480, which is answered by voicemail and the message is recorded and submitted to the competent Whistleblowing Committee of the Bank.
- Via email at whistleblowing@alpha.gr

The aforementioned channels operate exclusively for receiving reports and are available 24 hours a day / seven days a week.