



# Code of Ethics & Business Conduct Hellenic Waste Recycling S.A.

## Introduction and Philosophy:

Since its establishment, **HELLENIC WASTE RECYCLING S.A.** (hereinafter referred to as the “Company”) has adopted business practices governed by integrity, reliability, honesty, transparency, fair conduct in transactions, and full compliance with applicable legislation.

This Code forms the foundation of our corporate culture and reflects the commitments of Management toward our people, customers, and business partners. It applies to all employees, regardless of hierarchical level, as well as to all external providers and partners.

## Core Commitments of Management:

The Company’s Management is committed to:

- ✓ **Legal Compliance:** Full alignment with national and international laws, sectoral collective agreements, and data protection regulations.
- ✓ **Labor Rights:** Mandatory employment contracts, respect for collective representation, and full protection of minors’ rights.
- ✓ **Equal Opportunities & Inclusion:** Promotion of equality regardless of gender, race, religion, age, sexual orientation, or disability.
- ✓ **Zero Tolerance to Violence:** No tolerance for physical or psychological abuse, harassment, or inhumane treatment.
- ✓ **Health & Safety:** Provision of a safe working environment and free Personal Protective Equipment (PPE) to prevent workplace accidents.

## 1. Compliance with Applicable Legislation

The Company fully complies with the legislation of every region in which it operates. Employees are required to act ethically, maintaining high standards of honesty, integrity, and professionalism, and to comply with both applicable laws and the Company’s internal policies and procedures.

## 2. Conflict of Interest

All professional decisions must be made based on objective criteria. Employees are required to disclose any personal or family interests that could influence their judgment. Management and employees are not permitted to engage in private business activities within the Company without the prior **written approval of the Chairman and Chief Executive Officer.**

## 3. Confidentiality & Data Protection

The secure management of information and personal data is non-negotiable. The use of company assets, intellectual property, or non-public information for personal benefit, as well as disclosure to third parties, is strictly prohibited.

## 4. Competition & Fair Business Practices

We are committed to operating within the framework of free and fair competition, avoiding any behavior that could be interpreted as market manipulation or unfair commercial practice.



## 5. Anti-Bribery & Anti-Corruption

The Company implements an Anti-Bribery Management System and adheres to the following principles:

- ✓ **Prohibition of Bribery:** Any offer, promise, or acceptance of an improper benefit or facilitation payment is strictly prohibited.
- ✓ **Due Diligence:** Prior to any significant business cooperation, the Company conducts assessments of the reliability and background of its business partners.
- ✓ **Gifts & Hospitality:** Only gifts of low, symbolic value are permitted, provided they are appropriate to a healthy business relationship and do not create any sense of obligation or dependency.
- ✓ **Political & Charitable Donations:** The Company does not make political donations. Any charitable activity requires the prior written approval of the Chairman and Chief Executive Officer.
- ✓ **Third-Party Cooperation:** External providers are contractually bound to comply with the Company's anti-corruption policy.

## 6. Prevention of Discrimination & Harassment

Any form of discrimination in recruitment, remuneration, or promotion is strictly prohibited.

The Company ensures that job advertisements, training materials, and daily communication are free from discriminatory practices. Any incident of harassment results in immediate disciplinary review.

## 7. Occupational Health & Safety

The Company continuously assesses workplace risks and develops action plans for their elimination. In the event of injury, immediate assistance is provided along with full support for the employee's recovery and reintegration.

## 8. Alcohol & Narcotic Substances

The consumption of alcohol and the use of illegal substances during working hours or within company premises are strictly prohibited. Driving a company vehicle under the influence of alcohol or substances constitutes a serious disciplinary offense.

## 9. Environmental Protection

As a recycling company, environmental protection lies at the core of our mission. We are committed to the sustainable use of natural resources, pollution prevention, and the continuous training of our personnel in environmental management practices.

## 10. Use of Social Media & Email

Employees are required to use the internet and electronic mail strictly for professional purposes.

Communication with mass media outlets is carried out exclusively by authorized representatives of the Company.

## 11. Reporting of Illegal or Unethical Conduct (Whistleblowing)

We encourage the reporting of concerns in good faith through confidential channels:

- ✓ **Email:** Report.hellenicWrecycling@gmail.com
- ✓ **Protection:** We ensure that no retaliation will occur against any individual who submits a report in good faith.
- ✓ **Investigation:** All reports are reviewed by the Anti-Bribery Committee and Company Management.

## 12. Compliance with the Code & Sanctions

Violation of this Code may result in disciplinary actions, including termination of employment or cooperation.

Management is committed to providing all necessary human and financial resources for the continuous improvement of our systems.

Approval:

**CHAIRMAN & CHIEF EXECUTIVE OFFICER**  
**HELLENIC WASTE RECYCLING S.A.**  
**01/12/2025**



## Declaration of Compliance & Acceptance

*(To be signed by each employee / associate)*

By signing this declaration, I confirm that:

- ✓ **I have received, read, and fully understood** the content of the Code of Ethics & Business Conduct of HELLENIC WASTE RECYCLING S.A.
- ✓ **I commit to** strictly comply with its principles in the performance of my duties.
- ✓ **I acknowledge** my obligation to report any violation or suspected incident of bribery or corruption that may come to my attention.
- ✓ **I understand** that failure to comply with this Code may result in disciplinary or legal consequences.

**Full Name:** \_\_\_\_\_

**Position / Role:** \_\_\_\_\_

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

**Signature:** \_\_\_\_\_





# HELLENIC WASTE RECYCLING

