

# Code of Conduct for Sustainable Business, for Kapachim's Business Partners

V.3 - 19/03/2023



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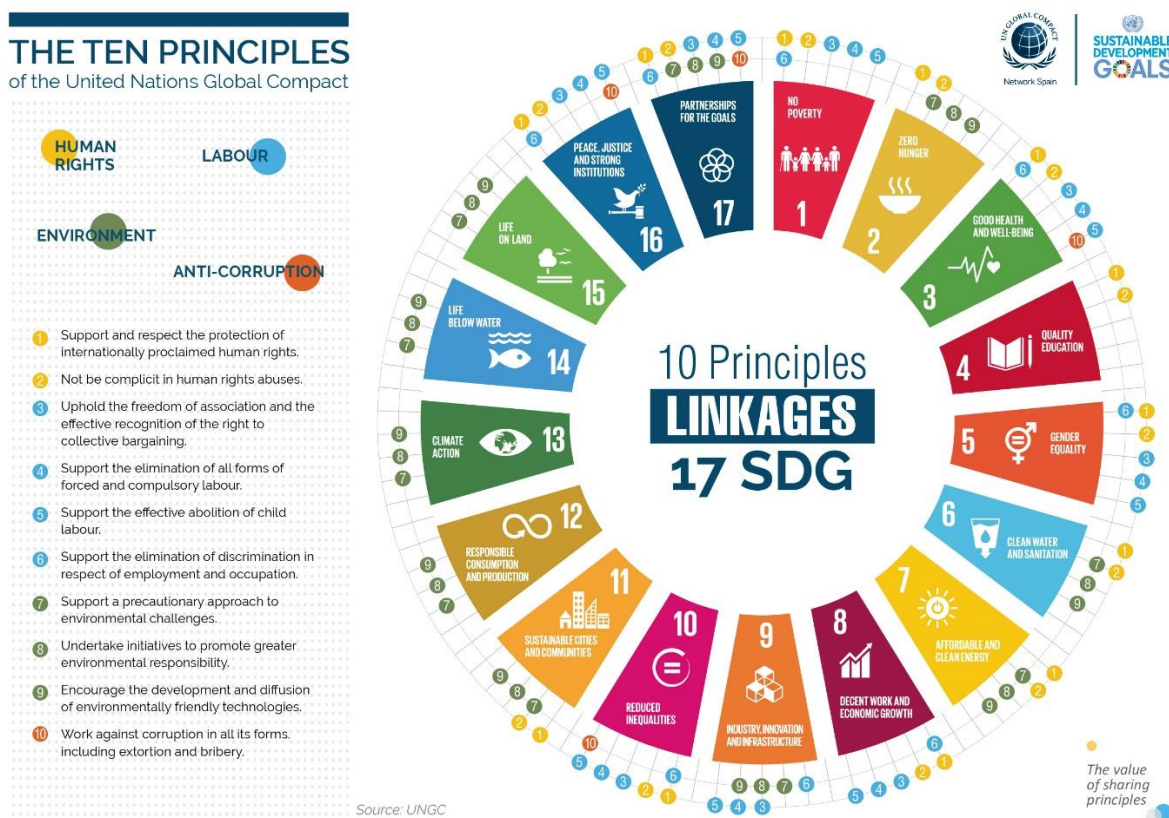
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## 1. Introduction

KAPACHIM S.A. (hereinafter referred to as: “KAPACHIM” or the “Company”) is a Greek producer of raw materials for products critical to health, personal hygiene, cleaning, and disinfection. It started in 1984 investing in innovation and development, and today provides technical solutions, based on its unique expertise, to multinational as well as Greek production companies of disinfectants, cleaners, and cosmetics. With around 100 employees and an annual turnover of approximately EUR 100 million, of which more than 80% is generated on foreign markets, Kapachim has a dominant presence in the Greek chemical processing industry. KAPACHIM’s vision is a thriving, fair and diverse organization working together respectfully to make a difference to each other and in the world.

Strategic objectives in the fields of environment, society and governance have been set for 2030. For the Company, achieving these strategic objectives is just as important as delivering business results. The Company promotes sustainable and ethical conduct for the benefit of people and the planet not only within the context of their business operations but also throughout the entire value chain.

KAPACHIM is committed to the ten principles of the UN Global Compact on Corporate Social Responsibility in the areas of human rights, labour, the environment/climate and combating corruption.



**We expect the same from our business partners, which is why this Code of Conduct for Sustainable Business for KAPACHIM, d.d. Business Partners (hereinafter referred to as: the “Code”) expresses our expectations and requirements towards our business partners and their supply chain.**

## 2. Compliance with applicable regulations and the Code

KAPACHIM complies with all applicable regulations and acts in accordance with this Code.

We expect our business partners to comply with all applicable regulations and to establish systems, controls and rules to promote compliance with applicable regulations and this Code, including training, monitoring and auditing mechanisms. Business partners are responsible for verifying compliance with the Code and for meeting the requirements it lays down, both on the level of their own organisation and in their supply chain.

KAPACHIM uses checklists and self-assessment questionnaires to monitor and assess compliance with the standards laid down in this Code. In case of non-compliance, the business partner is obliged to undertake corrective action. If the business partner fails to remedy the non-compliance in a timely manner, KAPACHIM may, at their sole discretion and without any additional obligations, suspend procurement, refuse delivery or return the goods, refuse performance of the service or terminate the agreement.

For the purpose of delivering goods and services to the premises of KAPACHIM, all business partners of KAPACHIM are prohibited from commissioning any subcontractors and sub-suppliers without prior written approval of KAPACHIM.

## 3. Health and Safety at work

KAPACHIM is committed to protecting the health and safety of their employees, contractors and the community where the Company operates. In addition, KAPACHIM expects all business partners to ensure a safe and healthy work environment for their employees in accordance with applicable regulations.

### **We expect our business partners to:**

- comply with all applicable health and safety and obtain and observe all the necessary permits, licences and registrations,
- comply with regulations regarding working hours, rest periods, remuneration and other employee benefits,
- protect employees against hazards (chemical, biological, electrical and physical),
- take appropriate measures to provide adequate lighting, temperature, ventilation, drinking water and protective equipment for employees,
- ensure that employees know the risks at the workplace and are properly trained for their prevention,
- ensure the safe transport and handling of raw materials and to provide safety data sheets and appropriate labelling for all hazardous substances,
- comply with the safety requirements of KAPACHIM when working at or visiting the premises of KAPACHIM and undergo the necessary safety training,
- provide a quality and safe product or service.

## 4. Respect for Human Rights

At KAPACHIM, we treat our employees and all our business partners with dignity and respect. We want to create an environment where employees can express their creativity and innovation. We provide continuous education and training for our employees and introduce innovative approaches to empower them. We have zero tolerance for unethical business practices such as child labour, slavery or human trafficking in all business activities and facilities operated by our business partners. Practices such as



confiscation of passports, salaries or personal property and forced overtime are unacceptable. KAPACHIM strives to eliminate inequality, racism and all forms of discrimination.

**We expect our business partners to:**

- respect the personal dignity of each individual and prevent any form of discrimination, harassment, intimidation, oppression or exploitation,
- protect human rights in all areas where they operate,
- **not** use child or forced labour, resort to any form of punishment, harassment, abuse or involuntary servitude,
- respect the privacy of personal data to which they have access and process them only for legitimate business purposes, in a lawful, transparent and secure manner,
- respect the freedom of association of employees and recognise the right to collective bargaining as a means of resolving issues in accordance with applicable laws; and
- place a strong emphasis on human resources management – providing training for employees, ensuring they are well informed, have appropriate working conditions, receive adequate remuneration and are committed to responsible recruitment practices.

## 5. Ethical Conduct

KAPACHIM is committed to ethical behaviour in all aspects of their business activities. During their work, all employees act ethically and professionally in accordance with the Code of Ethical Conduct and Work of KAPACHIM and the values of the Company, as well as in accordance with the applicable regulations and internal acts of the Company.

**We expect our business partners to:**

- act with high level of integrity and transparency and in compliance with all anti-corruption legislation,
- conduct business operations in accordance with the principles of fair competition and all rules for the protection of competition,
- comply with applicable money laundering rules, respect intellectual property rights,
- safeguard confidential information and adequately protect it against unauthorised access, use, disclosure, alteration or destruction,
- implement the processes to address confidentiality and protect employees who raise concerns in good faith, make a report or assist in any investigation into potential ethical or criminal infringements,
- show zero tolerance to any form of bribery and adhere to KAPACHIM's rules on gifts, which prohibit giving of gifts beyond the usual occasional gifts of small value. We expect business partners never to send invitations or offer hospitality that goes beyond normal business practices, and never to send invitations that include travel expenses, accommodation costs or entertainment-only events. In case any gift-giving occurs, it must be performed in accordance with normal business practices and have a clear business purpose, whereby gifts cannot be construed as a bribe and may not be offered with the intention of improperly influencing the business relationship and they must comply with applicable

## 6. Diversity, Equity and Inclusion

KAPACHIM is dedicated to promoting diversity, equity, and inclusion within its own operations and expects the same commitment from its business partners. We believe that a diverse and inclusive workforce drives innovation and reflects the diverse global community we serve. Therefore, we encourage our business partners to adopt practices that foster an inclusive and equitable work environment.

### **We expect our business partners to:**

- Implement policies and practices that promote diversity, equity, and inclusion within their workforce.
- Actively work to include women-owned businesses in their supply chain.
- Support and collaborate with minority-owned businesses to foster economic inclusion.
- Provide equal opportunities for all employees regardless of gender, race, ethnicity, religion, age, sexual orientation, or disability.
- Advance initiatives that support diversity and inclusion in their recruitment, retention, and development practices.

## 7. Environment

As a company with a high level of responsibility towards the natural environment, at KAPACHIM we manage all environmental impacts of our activities and throughout the entire value chain in a systematic and integrated manner and communicate this transparently with all stakeholder groups. With this ambitious stance, we are aligned towards a common goal for a green, low-carbon and competitive EU economy with high added value for wider social well-being.

### **We expect our business partners to:**

- focus on improving environmental performance and social responsibility, economically use the natural resources,
- consider the use of renewable sources in their supply chains wherever possible, reduce waste and re-use materials wherever possible,
- systematically identify and address potential environmental hazards, comply with all applicable environmental regulations,
- implement an environmental protection system with all the necessary environmental permits and report accordingly

## 8. Material Compliance

The purpose of material compliance is to ensure the safe handling of the material. A material compliance standard is a legal requirement (e.g. REACH).

### **We expect our business partners to:**

- implement updates in line with the applicable regulations, latest guidelines and standards, not use products and raw materials of unknown origin or composition,
- prevent the use of so-called conflict minerals (tin, tantalum, tungsten, coltan, niobium, gold); and not procure materials from illegal sources.

## 9. Final Provisions

By signing the Code, the business partner acknowledges that they have received, read and understood this Code. They further confirm that they will comply with this Code and ensure that their employees and/or subcontractors will also comply with it. In addition, they confirm their willingness to verify compliance with the Code through checklists and self-assessment questionnaires. KAPACHIM reserves the right to verify the compliance of business partners with this Code through internal and external assessment mechanisms.

I hereby confirm that I am authorised to sign on behalf of the undersigned business partner.

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

Name and surname of the responsible person: \_\_\_\_\_

Date and place of signature: \_\_\_\_/\_\_\_\_/\_\_\_\_ - \_\_\_\_\_