

Code of Conduct For the Business Partners of PLASTIMAK S.A.

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1. INTRODUCTION

The Code of Conduct defines the fundamental requirements of PLASTIMAK S.A. towards all its business partners, including suppliers of goods and services, regarding their responsibility to respect **human rights and the environment**.

By adhering to this Code of Conduct, PLASTIMAK S.A. aims to implement its corporate social responsibility and fundamental principles of fair, ethical, and sustainable business conduct throughout its commercial chain. Based on the values outlined in this Code, the company seeks close cooperation with suppliers and other partners to create mutual added value for all stakeholders.

2. COMPLIANCE WITH THE CODE OF CONDUCT

A fundamental obligation for companies is to comply with national legislation concerning human rights. However, in cases where the respective legal requirements conflict with international human rights regulations, companies should comply with the principles that provide the highest protection for the employees and the environment. Also, attention should be given to ensure that companies avoid their potential involvement in violations of recognized human rights as a result of legal compliance within the framework in which they operate.

In order to verify the effort to address potential violations, companies should systematically monitor and document the procedures they follow and demonstrate their respect for human rights as well as the effectiveness of these measures. Recording should be done with appropriate qualitative and quantitative indicators based on both internal and external feedback from stakeholders. Finally, this traceability process should be included in the internal procedures of each company, utilizing tools that are already used for other issues, such as—though not limited to—questionnaires and inspections.

Business partners should be available at all times to communicate the process they follow to protect human rights, especially in cases where there is an indication of a violation of these by or towards the stakeholders.

The principles of the code of conduct are based, to a large extent, on the principles of the Universal Declaration of Human Rights of the United Nations, the ETI Base Code, and the International Labour Organization (ILO). PLASTIMAK S.A. reserves the right to change the requirements of this code, always within reasonable limits and by informing all interested parties.

PLASTIMAK S.A. requires all its business partners to comply with this Code of Conduct, particularly with regard to the fight against corruption, and to take all necessary measures to ensure compliance with the Code of Conduct by their respective business partners.

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3. CORPORATE RESPONSIBILITY FOR HUMAN RIGHTS

The corporate responsibility for the respect and protection of human rights exists independently of the state's commitment to their protection and the adherence to national laws and regulations. Business partners are obligated to implement measures for the prevention, limitation, and remediation of potential or existing human rights violations, as defined in the Articles of the Universal Declaration of Human Rights of the United Nations.

4. FUNDAMENTAL PRINCIPLES

4.1 Prohibition of forced or compulsory labor


The term forced or compulsory labor refers to situations in which a person is coerced to work against his or her will, under threat of punishment or penalty. Any form of slavery, forced or involuntary labor, or human trafficking constitutes a serious violation of human rights and is strictly condemned under this Code. PLASTIMAK S.A. is fully committed to a zero-tolerance policy towards all forms of modern slavery and to conducting its operations ethically and with integrity.

Applicants for any open position within the company are requested to submit only their curriculum vitae, without being required to provide any document that could bind or restrict their rights (e.g., residence permit, passport, medical examinations, or pregnancy tests), except where such documents are explicitly required by law (e.g., copy of an individual work permit for security staff). Copies of diplomas, certificates, or other documentary evidence of qualifications and legal obligations are submitted only after successful completion of the selection process and acceptance of the position, terms, and benefits by the candidate.

The company does not impose any financial charges on employees for training upon recruitment or for obtaining necessary work equipment. Management recognizes and safeguards the right of employees to refuse to perform tasks that may endanger their physical or mental integrity, contravene legislation, or are assigned under coercion, threat, or intimidation by a superior. The company shall not compel employees to work beyond their scheduled hours or shifts, nor prevent their free movement or departure (e.g., through locked doors or guards). However, employees may voluntarily extend their working hours on their own initiative (applicable only to administrative staff).

In addition, employees have the right to leave the workplace in cases of emergency, such as the need to provide medical assistance or other sudden incident. The company ensures that all employees have the right to resign upon the expiration of their contract or at any time without paying any fee or charge. Upon their resignation, employees receive all accrued amounts in full, including paid leave and related benefits. The

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requirement to provide notice complies with applicable legislation and provided that the employer has been informed in a timely manner. The resignation process is implemented clearly, transparently and without pressure or retaliation against the employee. or termination of the employment relationship.

The company implements a remediation procedure for workers in cases of actual or potential forced labor, human trafficking or bonded labor, as provided for by the principles of SA 8000 and ILO Conventions (ILO 29 and 105). Upon recognition of such an incident, the worker is immediately protected, a confidential investigation is conducted and a remediation plan is drawn up that may include cessation of the forced practice, return of withheld documents or money, access to support and assurance that there will be no retaliation. All actions are documented and verified, while where necessary the company cooperates with competent bodies to ensure the well-being and rights of the worker.

The company's business partners must comply with the principles of free and fair employment, ensuring that no forced, bonded or coerced labor practices are applied, and that no documents, deposits, or payments are required from candidates or employees as a condition of recruitment or employment. They must also provide a safe working environment, refrain from restricting workers' freedom of movement at the end of the working day, and respect their right to refuse tasks that endanger their health or safety. Business partners must also allow workers to terminate their employment and leave freely, subject to reasonable notice.

Business partners are equally required to comply with these principles.

Responsibility for monitoring and ensuring compliance with the prohibition of forced labor lies with the Human Resources Manager, thereby ensuring proper implementation and supervision of the system.

4.2 Freedom of association and the right to collective bargaining

The company and its business partners guarantee full respect for the freedom of association and the right to collective bargaining, allowing employees to join or form trade unions of their choice without fear of discrimination or retaliation. Management maintains an open and positive attitude toward the existence and operation of workers' unions and recognizes their role as legitimate representatives for safeguarding employees' rights, granting them appropriate access and facilities to perform their duties.

Where such rights are restricted by law, the company facilitates the development of alternative, independent and free forms of worker representation and dialogue, thereby ensuring continuous employee participation in matters concerning working conditions and labor rights.

Business partners are equally required to comply with these principles.

Responsibility for monitoring and ensuring compliance with the right to freedom of association and collective bargaining is assigned to the Human Resources Manager, ensuring proper implementation and oversight of the system.

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4.3 Child labor and special protection of young workers

The company fully complies with national labor legislation, the International Labor Organization (ILO) Conventions, the SA 8000 Standard and the ETI Base Code regarding the protection of children and young workers.

No form of child labor is permitted, and under no circumstances are persons below the minimum legal working age of 15 years employed, as defined by Law 3850/2010 and Presidential Decree 62/1998, in alignment with ILO Convention 138. The company verifies the age of all employees during recruitment by requesting documentary proof of identity, while fully respecting individual dignity, to ensure that no person below the minimum legal working age is employed. In Greece, the minimum legal working age is 15, following completion of compulsory education.

If a child is found to be working, the company will act immediately and responsibly, implementing a remediation procedure in accordance with the requirements of the SA 8000 Standard. In this context, the company will cooperate with competent authorities, educational institutions, and social organizations, and—where required—participate in or contribute to reintegration programs that ensure the child’s transition to and continued attendance in quality education until he or she is no longer a child, in accordance with applicable law and international standards. This process ensures that the child does not suffer economic or social harm as a result of the termination of employment and that all interventions respect the dignity and best interests of the child, as prescribed by the principles of SA 8000 and ILO Conventions 138 and 182.

Young workers, defined as individuals aged 15 to 18, may be employed only under the conditions established by law and the SA 8000 Standard, with full respect for their rights, appropriate supervision, and work duties suitable to their physical and moral development, posing no risk to their health or safety. No person under 18 years of age is employed in night work or in hazardous or unhealthy conditions. The company ensures that all relevant regulations, policies, and procedures are aligned with ILO Conventions 138 and 182, the ETI Base Code, and national provisions for the protection of underage workers.

Business partners are equally required to comply with these principles.

Responsibility for monitoring and ensuring compliance with the prohibition of child labour and the protection of young workers rests with the Human Resources Manager, ensuring correct implementation and supervision of the system.

4.4 Decent (living) wages – fair remuneration

Company management ensures that wages and benefits paid to employees meet or exceed national legal standards and/or industry benchmarks, while also covering the basic needs of employees and their families and providing some discretionary income. The company provides all statutory social benefits. All employees are informed clearly and in writing about their terms of employment and remuneration, both prior to

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commencement and during each pay period. Salaries are paid fully, accurately, and on time in legal tender. Wage levels are related to employees' skills and qualifications and refer to regular working hours.

The company does not apply any arbitrary or disciplinary deductions from wages, except where explicitly permitted by law and with the employee's informed consent, and all disciplinary measures are officially documented and recorded.

In addition, the company monitors national and international Living Wage benchmarks and compares them with internal remuneration levels, aiming—where feasible—to ensure a decent and sustainable standard of living for all employees.

Business partners are expected to comply with the above.

Responsibility for monitoring and ensuring compliance with fair remuneration requirements lies with the Human Resources Manager, ensuring proper implementation and oversight of the system.

4.5 Decent working hours

Company management ensures that working hours fully comply with national legislation and collective agreements, providing maximum protection for employees. Regular working hours do not exceed 48 hours per week, while overtime is voluntary, agreed upon with the employee, and compensated at the legally required premium rate. Overtime is not used to substitute regular staffing needs but only to address temporary increases in workload.

Within any seven-day period, total working hours do not exceed 60, except in exceptional, well-documented circumstances, where all safety and legal requirements are met. All employees are entitled to at least one day of rest per seven-day period, in accordance with labor legislation.

The company maintains an accurate attendance recording system, verified and signed by employees.

Business partners must also comply with the above requirements.

Responsibility for monitoring and ensuring compliance with decent working hours lies with the Human Resources Manager, ensuring correct implementation and supervision of the system.

4.6 Non-discrimination

The company enforces an Equal Opportunities Policy, ensuring that no form of discrimination occurs at any stage of the employment relationship—from recruitment and remuneration to training, evaluation, promotion, or termination. All employment decisions are based solely on qualifications, skills, and performance, irrespective of gender, age, nationality, religion, disability, marital status, sexual orientation, trade-union activity, or political beliefs. Management promotes a workplace culture of equal opportunity, respect, and inclusion, rejecting any form of discriminatory treatment or exclusion.

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Business partners are likewise required to comply with these principles.

Responsibility for monitoring and ensuring compliance with the non-discrimination principle rests with the Human Resources Manager, ensuring proper implementation and supervision of the system.

4.7 Regular employment

The company ensures that all employment relationships are based on legal and recognized forms of engagement, avoiding any practice that could create social or economic insecurity for employees. All positions are governed by documented employment contracts describing terms, rights, and obligations in accordance with national labor law and international labor standards, applying whichever provides the greatest protection to the employee.

The company does not use labor-only contracting, sub-contracting, or short-term contracts to avoid legal or social-security obligations, nor misuse apprenticeship or internship programs. All employment relationships are stable, lawful, and transparent, ensuring job security and protection of workers' rights.

Business partners must also comply and refrain from using contractual arrangements that deliberately misrepresent the legal nature of employment.

Responsibility for monitoring and ensuring compliance with regular employment standards lies with the Human Resources Manager, ensuring correct implementation and oversight of the system.

4.8 No harsh or inhumane treatment

The company ensures that no employee is subjected to physical, psychological, or verbal abuse, or to any form of sexual or other harassment, intimidation, or threat. All disciplinary measures are applied with respect for human dignity, without violence or humiliation. Management enforces a zero-tolerance policy against any form of cruel, degrading, or inhumane behavior and guarantees a safe, respectful, and supportive work environment. The company also provides employee training on appropriate workplace conduct and maintains confidential grievance mechanisms for reporting harassment or misconduct without fear of retaliation (Procedure OE-30-10).

The company ensures that all employees have the right to communicate freely with colleagues, supervisors, employee representatives, as well as with people outside the workplace, without undue restrictions. No practices are implemented that aim at or result in isolation, exclusion or deprivation of social interaction. Any work organization measures (such as shifts, assignment of spaces or tasks) must not unduly restrict communication or physical social contact between employees. If an employee believes that they are being restricted or isolated, they can report it confidentially to the Human Resources Department or through the available reporting line, so that it can be investigated immediately and corrective measures can be taken.

Business partners are required to uphold these same principles.

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Responsibility for monitoring and ensuring compliance with this prohibition lies with the Human Resources Manager, ensuring correct implementation and oversight of the system.

5. SOCIAL RESPONSIBILITY PRINCIPLES

5.1 Occupational Health and Safety

Company management ensures that the working environment is safe and hygienic, in line with the ETI Base Code and applicable legislation. Procedures and systems are in place to identify, assess, prevent, and respond to occupational risks that may endanger employees' health and safety. Preventive measures are implemented through regular inspections and risk assessments.

All employees receive systematic health and safety training, repeated upon recruitment, role changes, or as needed. In case of emergency, a contingency plan is established, and all employees are trained accordingly, with the right to evacuate immediately without prior authorisation when facing imminent danger. Adequate medical care, clean toilets, potable water, suitable food-storage facilities, and safe and sanitary accommodation (where provided) are ensured. Mandatory insurance coverage also forms part of worker protection.

Vulnerable groups—such as young workers, pregnant employees, persons with disabilities, and other sensitive categories—receive special protection.

Business partners must ensure safe and hygienic working conditions, take all necessary preventive measures against accidents and occupational hazards, provide suitable health and safety training to all personnel, guarantee access to clean sanitation, drinking water, and safe food-storage facilities, and maintain safe, decent housing where applicable. They must also appoint a responsible officer for monitoring health and safety performance.

Responsibility for monitoring and continuous improvement of occupational health and safety conditions lies with the Human Resources Manager, ensuring correct implementation and supervision of the system.

5.2 Environmental Protection

Environmental protection, minimization of impacts, and ecological orientation constitute a core and permanent commitment of the company. All business partners are therefore required to comply with environmental laws and to integrate preventive and corrective measures to mitigate potential environmental impacts.

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Responsibility for monitoring and ensuring continuous compliance with environmental protection requirements lies with the Quality Department Representative, ensuring proper implementation and oversight of the system.

6. ETHICAL BUSINESS CONDUCT

PLASTIMAK S.A. is committed to combating corruption and expects the same from its business partners. Compliance with this principle requires all parties to refrain from acts of corruption, extortion, or embezzlement, and from any form of bribery. Furthermore, business partners shall not engage in falsification of information or misrepresentation. They are expected to maintain accurate records regarding their activities, structure, and performance, and to disclose such information in accordance with applicable regulations.

7. DATA PROTECTION AND CONFIDENTIALITY

All business partners of PLASTIMAK S.A. should collect, use and process personal information, including that which relates to employees, business partners, customers, and consumers, in accordance with the relevant national data protection laws and regulatory requirements.

Confidential information and corresponding records should be used exclusively for internal purposes without being disclosed or accessible to third parties, unless permission has been granted or the information is public. In any case, the disclosure of confidential information and data is acceptable only in necessary situations. For example, in the case of cooperation with external consultants, these consultants are required to sign a confidentiality agreement, unless they are subject to a relevant obligation based on professional secrecy.

No one shall be subjected to arbitrary interference with their privacy, family, home or correspondence, nor to attacks upon their honor and reputation. Everyone has the right to the protection by the law against such interference or attacks.

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