

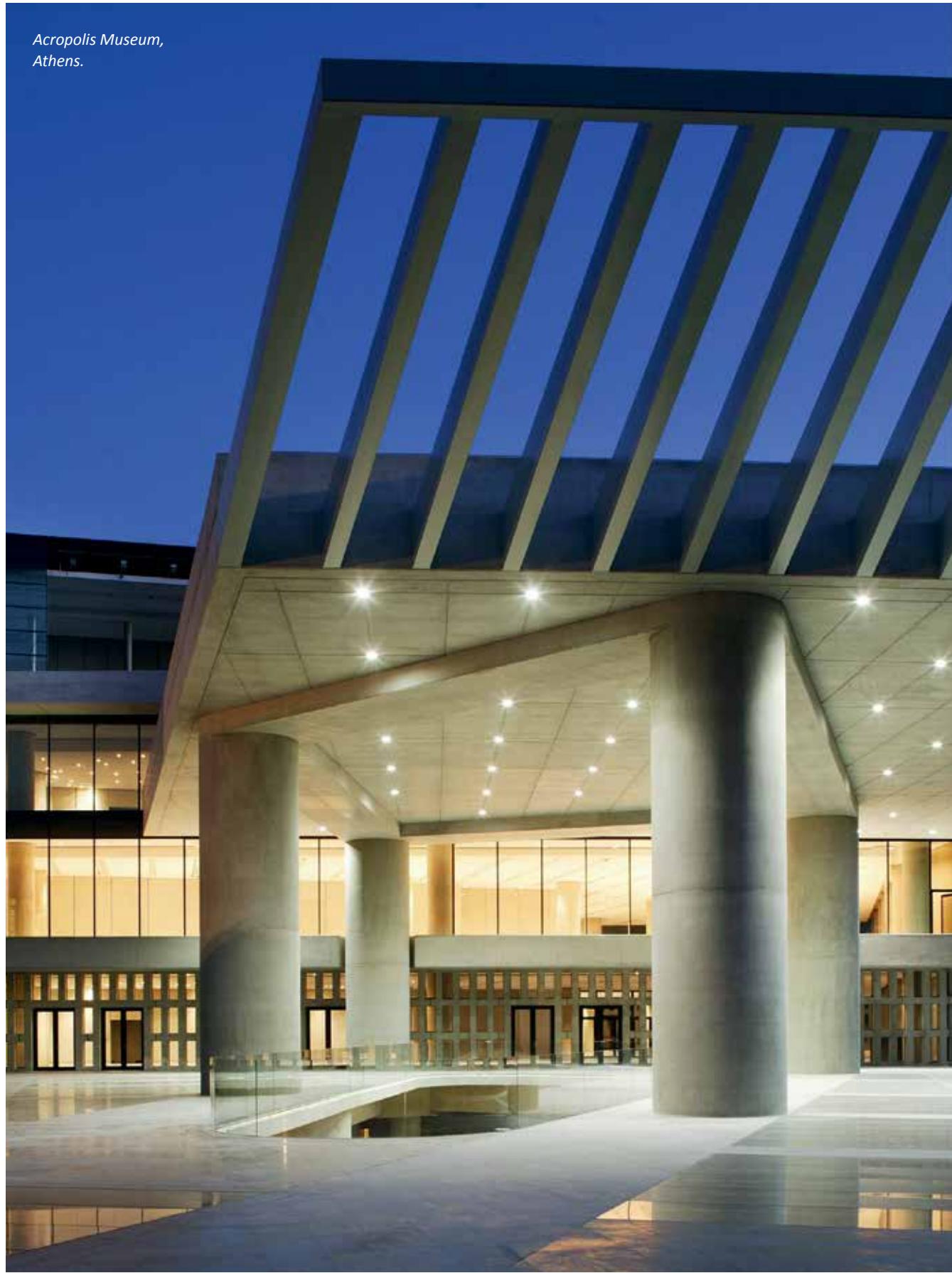


ELLAKTOR
GROUP

BUSINESS PARTNER'S CODE OF CONDUCT

*Acropolis Museum,
Athens.*

2



FOREWORD

ELLAKTOR commits to conduct its business in compliance with all applicable laws and regulations, act upon the highest ethical standards and treat others with respect, according to the principles laid down in this Business Partner Code of Conduct (the Code).

This Code explains what ELLAKTOR expects from you as a Business Partner with regards to business ethics, human rights, employee relations, health and safety, and other topics related to sustainable and responsible business practices.

As our Business Partners, we expect you to adopt and comply with the ethical business standards and values set out in this Code, and to actively use such standards when dealing with your own subcontractors.

The Code of Conduct for Business Partners applies to any third party that engages in business dealings with ELLAKTOR, such as suppliers, subcontractors, customers, and anyone providing services to the Group companies or acting on behalf of the Group.

The Code is not intended to replace Business Partner's existing policies but sets the principles that ELLAKTOR follows and expects its business partners to respect.

4

*Moreas Motorway,
Peloponnese*



OUR COMMITMENT TO INTEGRITY

Act with integrity and respect in all business dealings.

ELLAKTOR is committed to the highest standards of integrity across all its operations and condemns any acts of unethical business practices or unethical behavior from its Employees or Third Parties.

Having adopted the UN Strategic Development Goals of 2030, ELLAKTOR actively promotes the fundamental principles of these goals, as these are essential components in managing the challenges and opportunities of a rapidly changing global environment. ELLAKTOR cultivates an environment of fair collaboration, mutual respect and open communication with its Third Parties.

Business Partners, and all persons acting on their behalf, are expected to abide by their commitments and act with integrity, honesty and fairness in all aspects of their business. As an integral part of ELLAKTOR's supply chain value processes, all Third Parties are expected to have in place internal policies, procedures, training activities and controls that ensure ethical business practices and behavior across their business operations.

WORKING TOGETHER

ELLAKTOR operates in many countries around the world and engages with Third Parties that operate nationally or internationally. This requires ELLAKTOR to comply with various national and international laws and regulations.

As a Business Partner of ELLAKTOR, you are expected to also comply with the corresponding national and international laws and regulations, applicable to the jurisdictions that you operate and conduct your business activities by applying high integrity standards that encompass the following:

1. Ethical business practices

Maintaining Accurate Financial Records

We create and maintain accurate and complete records using recognized accounting standards and security measures. Keeping accurate books and records as well as declaring taxes and duties is part of running a lawful and transparent business in a sustainable way. ELLAKTOR expects its Business Partners to comply with all applicable laws and accounting rules in this respect.

6

Refraining from Acts of Influence (Gifts and Hospitality)

ELLAKTOR embraces different cultures and customs and recognizes that gift-giving and hospitality is an integral part of these different cultures and customs. Gift giving or taking, and hospitality must be transparent, modest, and reasonable. Expensive gifts and gifts of cash or cash equivalents are strictly prohibited.

Operating with Transparency

ELLAKTOR complies with all applicable anti-corruption laws and conducts business transparently. The direct or indirect offer, granting or acceptance of illegitimate benefits to generate, maintain or accelerate business is unacceptable.

Business Partners must ensure that no such benefits are exchanged in the course of their and their sub-contractors' businesses.

Avoiding Conflicts of Interest

Business Partners and persons acting on their behalf must avoid conflicts of interest with respect to their private activities, entities in which they or their close relatives or associates have an interest, and business activities with ELLAKTOR or other parties. A Business Partner must inform ELLAKTOR about any conflicts of interest as soon as they become aware of them.

Ensuring Fair Competition

ELLAKTOR complies with antitrust and competition laws and does not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e.g. regarding markets, customers, strategies, prices and the like.

All Business Partners and all persons acting on their behalf are expected to participate in public tenders and private sector bidding procedures by strictly following the applicable laws and regulations.

Protecting Information and Personal Data

Business Partners may be given access to confidential information as part of the business relationship. This information should not be shared with anyone, without the expressed authorization of ELLAKTOR. Certain engagements may also require the exchange of personal information. For this purpose, we ensure that the processing and storage of such information is conducted in compliance with the respective data privacy laws and regulations and an appropriate information security framework is implemented.



*Mechanical Biological
Treatment Plant, Sofia.*

2. Promoting a Healthy and Safe Work Environment

We focus on maintaining a healthy and safe work environment for all employees, by effectively monitoring, preventing, reducing or removing any risks associated with the work our employees and supply chain undertake in support of our zero harm aims.

Business Partners must take the necessary steps to ensure a safe and healthy working environment for all their employees.

3. Respecting Human Rights & Labor Standards

Everyone has the right to be treated equally, with dignity and respect, to exercise their freedom, and be free from discrimination, intimidation, or harassment.

We adhere to the fundamental principles set forth by the United Nation's International Bill of Human Rights, the corresponding guidelines of the Organization for Economic Cooperation and Development (OECD) and the standards of the International Labor Organization (ILO).

ELLAKTOR expects its Business Partners to treat their employees, and all persons acting on their behalf, with the highest ethical standards and will not engage in acts such as: forced labor, child labor, employee compensation beneath minimum wage, not allowing collective bargaining, violation of labor rights, and excessive working hours.

8

4. Protecting the Environment

We comply with environmental laws and regulations diligently seek to minimize or eliminate any negative environmental impact.

ELLAKTOR recognizes that acting in an environmentally responsible manner is essential and expects all its Business Partners to respect applicable legislation and encourages them to pursue initiatives to reduce their environmental footprint.

5. Engaging Responsibly with the Communities

We respect cultures, adhere to local laws and regulations, and fulfill our commitments (i.e. pay taxes and social contributions) to the various communities that we operate.

ELLAKTOR also recognizes the importance of giving back and encourages all its Business Partners to contribute to the various communities that they operate. Any such activities though, need to be performed transparently and be charitable in nature, without an expectation of reciprocation to any activity related directly or indirectly to ELLAKTOR.

*Wind Farm "Lyrkeio",
Argolis-Arcadia.*



ELLAKTOR
Headquarters.

10



Raising a Concern

Talk2Ellaktor

We expect everyone to report any concerns or issues regarding non-compliance with ELLAKTOR's Code of Ethics and Business Partner's Code of Conduct, laws, regulations and in general, any act or omission which could harm ELLAKTOR or its reputation.

Even if you are in a situation that something just "doesn't feel right", you should always report your concern. All reports are treated confidentially and without any fear of any form of retaliation towards any person that in "good faith" reports a concern or a potential violation. These reports should be done to the best of knowledge and belief.

Any information provided will be checked for plausibility by specifically trained persons who are obligated to confidentiality.

ELLAKTOR offers multiple channels for raising concerns or/and reporting issues, under the Talk2Ellaktor:

-  **Portal:** Talk2Ellaktor
-  **Phone:** +30 210 818 5005 (Mon-Fri 10.00 - 15.00)
-  **Email:** compliance@ellaktor.com
-  **Mail:** ELLAKTOR Group, Ermou St. 25, GR 145 64 Nea Kifissia, Athens- Lamia National Road, Olympic Vilage Interchange, Greece

11

Monitor and Compliance

ELLAKTOR will monitor compliance to the Code and reserves the right to investigate any reasonably suspected breach. It is the intention of ELLAKTOR to terminate its relationship with any Business Partner who does not comply with this Code of Conduct or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.



**ACT WITH
INTEGRITY AND RESPECT
IN ALL BUSINESS
DEALINGS**

Ermou St. 25, GR 145 64, Nea Kifissia
Athens- Lamia National Road, Olympic Village Interchange, Greece

www.ellaktor.com