

# Business Ethics and Anti-Corruption Policy

ANOXAL is committed to conducting its business with honesty, fairness, integrity and in compliance with all relevant laws. ANOXAL ensures transparency in all interactions and acknowledges that it has a moral and legal obligation to act responsibly in all jurisdictions. ANOXAL sustainable business growth and success shall rest on the excellence of its products and services. ANOXAL cannot tolerate illegal or unethical business activity or unfair competition practices. Its performance and competitiveness are strengthened solely through lawful conduct.

ANOXAL encourages all its related parties to have the required understanding and consciousness, and to co-operates in any actions that help fight corruption.

## **Anti-corruption and anti-bribery**

ANOXAL is fully opposed to all kinds of bribery and corruption. In compliance with the anti-corruption and anti-bribery relevant laws as well as internal guidelines, ANOXAL does not tolerate any form of bribery among employees, public officials, business partners or any business practice that could create the impression of inappropriate influence. ANOXAL is determined to maintain a culture of honesty and opposition to fraud and corruption. Accepting bribes or bribing can never be accepted for any purpose.

Financial or other contributions to political parties, officials thereof or candidates for public office shall never be made on behalf of ANOXAL.

## **Gifts, invitations, and other gratuities**

When it comes to gratuities in the form of gifts or invitations, ANOXAL strictly ensures that no appearance of dishonesty or improper behaviour can arise. ANOXAL does not allow for gratuities that can raise doubt about their intention or seem to influence business decisions.

Gifts or entertainment of any value to and from any prospective or existing customer or Business Partner (suppliers, contractors, consultants and business associates) should not be offered or accepted for the purpose of gaining a business advantage.

## **Sponsorships and donations**

Along with the values of responsibility, ANOXAL makes sponsorships and donations, being fully transparent and compliant with local laws, ethics and practices in order to promote education, culture, social or humanitarian causes, sports and environment-friendly behaviour.

## **Money laundering**

ANOXAL does not participate in any form of money laundering or illicit finance and complies with all relevant laws and regulations in any jurisdiction where the company conducts business. It undertakes the international battle against money laundering and adopts pertinent measures to comply with the relevant provisions.

### **Conflicts of interest**

Employees, management and members of the Board of Directors of ANOXAL conduct its private and other external activities and financial interests in a manner that do not conflict or appear to conflict with ANOXAL's interests.

### **Fair competition**

ANOXAL conducts its business in free, fair and open competition. ANOXALs' policy is to compete vigorously and fairly, but always in full compliance with applicable laws and business ethics.

ANOXAL must comply with all applicable antitrust and competition laws and is committed to dealing with competitors with honesty, fairness and integrity. Competitive advantages are gained through the product offering based on innovation, R&D and engineering and not through unethical or illegal business practices. ANOXAL does not enter into anti-competitive agreements with competitors, including price-fixing, market allocation or segmentation. ANOXAL does not exchange commercially sensitive information with competitors.

### **Accounting, books, and records**

ANOXAL shall maintain a system of internal accounting controls and keep its books and records, in reasonable detail that accurately and fairly reflect transactions and dispositions of assets. ANOXAL provides a transparent, truthful, relevant, comprehensive and timely disclosure of its affairs.

### **Personal data**

ANOXAL is committed to the proper and proportionate processing of personal data, strictly for the purposes known to the respective individuals, may the latter be staff, representatives of suppliers, customers or any other parties. Processing is performed in accordance with EU and local legislation, internal guidelines and the tenets of transparency and adhering to the individuals' rights. Personal data is only shared if mandated so by law or with third parties when essential in providing the required services and products while ensuring that these third parties will also comply to relevant legislation and guidelines.

ANOXAL commits to ensure that personal data is processed lawfully, fairly and in a transparent manner, collected for specified, explicit and legitimate purposes, are adequate, relevant and limited to what is necessary and kept for no longer than is necessary for its intended purposes.

### **Confidential Information**

ANOXAL protects confidential information, covering all information of a commercially sensitive nature that is not normally known to people outside the respective company. This may include technical information about products or processes, lists of customers, purchase prices and other contractual terms, cost, pricing, marketing or service strategies, Company strategy information, internal Company research material, market insight and any other confidential information obtained by while conducting business on behalf of ANOXAL.

### **Applicability**

This Policy applies to all employees, officers, directors, and legal entities of ANOXAL. When conducting business on behalf of the Company, third parties are required to observe the same level of integrity, ethical conduct, and compliance with the law as Company employees and management. In jurisdictions where local laws or regulations set stricter rules than those set out in this Policy, the stricter rules must always prevail.

### **Governance and accountability**

Responsibility for the implementation of this Policy lies with the most senior executive responsible for ANOXAL.

### **Compliance**

ANOXAL complies with the provisions of the business ethics and anti-corruption policy as well as national laws and regulations. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.

## Energy and Climate Change Policy

This policy confirms ANOXALs' approach to be a part of the global effort to tackle climate change. As significant consumers of both non-renewable and renewable energy, ANOXAL is committed to buying and using energy in a responsible, efficient, and cost-effective manner with the aim to reduce the carbon footprint.

To achieve this, ANOXAL is committed to :

- Comply with all energy and carbon-related legislation and other regulatory and reporting requirements.
- Improve energy efficiency continuously by implementing effective energy management programs that support all operations while providing a safe and comfortable work environment.
- Evaluate all infrastructure investments (new equipment, refurbishing of existing equipment) and new production processes on the basis of energy and carbon footprint contribution.
- Develop a strategy to effectively identify and reduce the carbon footprint; both from direct and indirect operations of the Company and its products.
- Engage in industry-standard initiatives to set up a carbon reduction program throughout the value chain and involve all stakeholders.
- Train employees in energy management practices according to their role and area of influence.
- Actively engage with trade and public bodies to develop and implement best practices.
- Regularly review and report on our performance and ensure continuous improvement.

Responsibility for the implementation of this Policy lies with the most Senior Executive responsible for ANOXAL.

## Environmental Policy

ANOXAL is committed to operate with responsibility and respect for the environment and society. Sound environmental management of production and storage installations is one of the most important aspects and is essential to the sustainability of ANOXALS' activities.

In order to achieve the goals, it is required that ANOXAL adheres to the following principles:

- operates in full compliance with applicable national environmental legislation and other company commitments, as well as with the specific environmental operational terms of each plant.
- operates responsibly, aiming to minimize potential impacts to the environment and biodiversity, and to establish and adhere to mechanisms for monitoring environmental aspects and risks.
- establishes and achieves meaningful targets for the Companies' environmental management systems, as well as goals for continuously improving its environmental performance and environmental footprint.
- strives to maximize the use of secondary raw materials in order to contribute to a circular economy and to minimize the carbon footprint of the products while at the same time optimize processes and develops new technologies to reduce the generation of waste.
- manages operational waste according to the principles of the circular economy.
- takes the necessary preventive measures to ensure environmental protection for the storage of hazardous substances.
- recognizes that water is a precious resource which must be conserved and aquatic life must be protected. ANOXAL make efficient use of water in their operations and increase efforts to reduce water consumption and increase water reuse.
- addresses any potential environmental incidents by following the designated procedure of environmental incident response and relevant incident investigation.
- communicates performance transparently and participates in an open dialogue on environmental issues with all stakeholders.
- encourages business partners (suppliers, subcontractors) to adopt environmental principles at least as stringent as those adopted by ANOXAL.

### **Governance and accountability**

Responsibility for the implementation of this Policy lies with the most senior executive responsible for ANOXAL.

### **Compliance**

ANOXAL complies with the provisions of the Environmental policy as well as national laws and regulations. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.

## Health and Safety Policy

ANOXAL is committed to provide a safe workplace and continuously promote Health and Safety for their employees as well as for their partners, including customers, suppliers, contractors, subcontractors, business associates and visitors.

ANOXALS' main goal is "No accident and no occupational illness" and in order to achieve this it is required by all its employees and business partners:

- to create a culture that all injuries and work-related illnesses can and must be prevented.
- to strictly comply with all applicable legislation and to fully implement all Viohalco standards, instructions and procedures regarding Health and Safety at workplace.
- to identify, evaluate and regularly update operational processes' Health & Safety risks and implement preventive measures aiming to mitigate them.
- to report and investigate in depth all incidents (accidents, near misses and unsafe situations), and to implement appropriate corrective and preventive measures so as to avoid their reoccurrence.
- to communicate all Health and Safety issues to all stakeholders openly and with transparency.
- to recognize the importance of peoples' attitudes and behaviours on Health and Safety and provide on-going information and training to support knowledge and skills development while encouraging their consultation and participation in all Health and Safety matters.
- to provide safe working conditions for the prevention of occupational injuries and illnesses that are appropriate to the organization and to the specific nature of its risks and opportunities.
- to continuously improve Health and Safety performance by engaging all stakeholders in the Health and Safety effort and integrate Health and Safety as a key element in all management process and corporate culture.

Employees and business partners should be committed to safeguarding Health and Safety "in all places at all times" as a condition of continued employment and collaboration.

**Health and Safety is everyone's responsibility.**

### **Governance and accountability**

Responsibility for the implementation of this Policy lies with the most senior executive responsible for ANOXAL.

### **Compliance**

ANOXAL complies with the provisions of the Health and Safety policy as well as national laws and regulations. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.

## Labour and Human Rights Policy

ANOXAL recognises the right of all employees and stakeholders to work with dignity and believes that everyone in the Company is responsible for having due regard for human rights.

Within ANOXAL, commitment on ethical principles is extremely important. ANOXAL supports and respects the fundamental principles, as articulated in the Universal Declaration of Human Rights. ANOXAL supports the protection of international human rights across the business value chain and will not be complicit in human rights abuses. ANOXAL policies and procedures adhere to all applicable domestic laws concerning freedom of association and collective bargaining, non-discrimination, forced labour and underage workers in the workplace.

ANOXAL commitment relies on principles concerning the fundamental human rights contained in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

### **Non-discrimination**

ANOXAL respects diversity and avoids any form of unfair or unlawful discrimination in employment or occupation, promoting a culture where people recognise the value that a diverse workforce brings. ANOXAL hires, assesses, remunerates and manages in a manner that does not discriminate with regard to gender, race, religion, age, marital status, disability, sexual orientation, nationality, political opinion, union affiliation, social or ethnic origin. Workplace diversity at all levels is encouraged.

### **Equality and equal opportunities**

ANOXAL does not tolerate any discrimination of race, gender, religion, age, nationality, social or ethnic origin, disability, belief, sexual orientation, or political and trade union engagement. These principles apply to the recruitment of new employees, to employees with an employment contract and to the professional promotion of its employees. The only decisive factors of employment are performance, experience, personality, efficiency, skills, qualifications and conduct.

### **Freedom of association**

ANOXAL upholds freedom of association and the effective recognition of the right to collective bargaining. ANOXAL respects employees' rights to freely associate, organize and bargain collectively in accordance with applicable laws and regulations, in support of its mutual interests.

### **No forced labour**

ANOXAL rejects any form of forced labour. All work performed in the company and its business partners must be voluntary. No form of forced, compulsory labour is tolerated at ANOXAL.

### **Underage workers (no child labour)**

ANOXAL prohibits the employment of individuals under the applicable statutory minimum age for workers and in any case, at a minimum age of 18, except in the cases of vocational training for young individuals. ANOXAL is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities

and legal restrictions. ANOXAL expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate.

### **No harassment**

Harassment (including all forms of sexual harassment and harassment based on other legally protected categories), bullying, rude or disrespectful behaviour and lewd comments are not allowed. ANOXAL prohibits any acts or threats of violence while conducting business on or off the Companies' premises and in regards to external stakeholders or within the Company's employees and management.

### **Working conditions**

ANOXAL compensates its employees with wages and benefits that meet or exceed the legally required minimum. Contracts must have written agreements on employment, containing agreed terms and conditions. Employees at ANOXAL are ensured the respect of working hours set on national laws and relevant industry standards. Overtime work is voluntary and employees are compensated for overtime work in accordance with local laws. Training is provided to all employees and ANOXAL is committed to equality of access to development and education opportunities.

ANOXAL must ensure that all employees enjoy a safe and healthy working environment and provide, a general wellbeing in the workplace. ANOXAL commits to continuously improve health and safety performance by integrating Health and Safety aspects in all operations

### **Grievance mechanism**

ANOXALS' employees are encouraged to raise any concerns regarding violations in the implementation of this policy and the Employee Code of Conduct, including harassment, intimidation or discriminatory behaviour to employees, serious health and safety risks that could threaten the health and safety of employees, the general public or customers. ANOXAL will accurately evaluate reported matters and where appropriate will adopt specific corrective measures, through well-established grievance mechanism schemes

### **Governance and accountability**

Responsibility for the implementation of this Policy lies with the most Senior Executive responsible for ANOXAL.

## Compliance

ANOXAL complies with the provisions of this labour and human rights policy as well as national laws and regulations. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.

# Supplier Code of Conduct

## **Introduction**

This Supplier Code of Conduct has the goal of ensuring that our suppliers, contractors, consultants and business associates (“Business Partners”) share and promote ANOXALs’ fundamental values in ethics and sustainability principles. ANOXAL requires their Business Partners to comply with all the principles in this Supplier Code of Conduct and will correspondingly promote these principles within their own supply chain.

Business Partners are expected to agree to an assessment of their performance on sustainability issues such as their environmental, social, and ethical performance either performed by ANOXAL or by third parties associated with ANOXAL. The participation of Business Partners in the sustainability assessment is considered essential for the business relation with ANOXAL as sound sustainability practices are expected from all of our Business Partners.

## **Business ethics and anti-corruption**

### **Compliance**

Business Partners are required to comply with all applicable local laws and regulations, including in all the countries in which they operate. Business Partners should have a formal system to establish rules and indicators, keep records and trigger corrective actions, in case of legal breaches or any violations of this Code, endorsed by senior management of the Supplier. Business Partners shall at any moment and upon request of Viohalco companies, be able to disclose information and performance indicators on business activities, labour, health and safety and environmental practices.

### **Business integrity**

Business Partners are required to adhere to the highest standard of ethical conduct in every aspect of their businesses, including relationships, practices, sourcing, and operations, and to not engage in any form of corrupt practices, including, but not limited to, extortion, fraud, bribery and money laundering.

### **Improper actions**

Business Partners are required to avoid behaviour or actions that would be an offense under any applicable laws relating to corruption and bribery.

### **Fair business and competition**

Business Partners are required to conduct their business activities in accordance with all applicable antitrust, competition and fair trade practice laws and regulations.

### **No improper advantage**

Business Partners must not offer or accept bribes or other means of obtaining undue or improper advantage.

## **Labour and human rights**

### **Equal opportunities**

Business Partners are expected to provide equality of opportunity and treatment and not to apply any form of discrimination in hiring and employment practices on grounds of race, colour, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status.

### **Child and forced labour**

Business Partners are required to prohibit child labour. Business Partners are required to employ only workers who meet the respective applicable minimum legal age requirement in the country of operation.

ANOXAL requires from their Business Partners to reject any form of forced or compulsory labour.

### **Harassment**

Business Partners are required to treat employees with dignity, equality and respect and are not harassed or discriminated against.

### **Safe working conditions**

Business Partners will ensure a healthy, safe and secure working environment for their employees. Business Partners are required to maintain a system for all personnel to report health and safety incidents, as well as a system to investigate, track, and manage such reports. Business Partners are required to comply with all applicable, health and safety laws and regulations and to implement, where necessary, corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

### **Working hours, wages and benefits**

Business Partners shall follow all applicable laws with respect to working hours, wages and benefits. Overtime shall be compensated at the prevailing overtime rates.

### **Freedom of association and collective bargaining**

Business Partners are expected to recognize and respect the right of employees to join or not join labour unions, associations or any other lawful organization and to comply with all relevant applicable local and national laws.

### **Conflict minerals**

Business Partners are expected to take measures to ensure that no minerals / raw materials are being used (manufactured or procured) which are considered conflict raw materials. Upon request, Business Partners shall provide country of origin information for the listed minerals.

**Environmental protection**

**Licenses and permissions**

Business Partners are required to comply with all required environmental permits, approvals and registrations and to follow the operational and reporting requirements of such permits.

**Pollution prevention, resource consumption and waste management**

Business Partners are expected to make continuous improvements with respect to environmental emissions as well as energy and resource management. Business Partners shall implement and demonstrate sound measures to prevent pollution and minimise generation of solid waste, wastewater and air emissions.

**Greenhouse Gas Emissions and Energy Consumption**

Business Partners should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.

**Product content restrictions**

Business Partners are required to adhere to all applicable laws, regulations regarding prohibition or restriction of specific substances, including labeling for recycling and disposal, e.g. REACH regulation, RoHS restrictions, CE marking etc.

**Personal data protection**

Business Partners are required to respect the personal data protection and undertake the appropriate measures according to the provisions of the General Data Protection Regulation 679/2016 of the European Union and the national implementation law 4624/2019. Aiming the attunement with the international standards and best practices, Business Partners should establish strict procedures for the protection of personal data throughout its spectrum of activities.

**Supplier acknowledgement**

I, the undersigned, on behalf of the company ..... acknowledge to have read and understood the terms and conditions expressed in the Supplier Code of Conduct and confirm that the company adheres and commits to compliance with the Code.

**Company Name** : \_\_\_\_\_  
**Signer's name and title** : \_\_\_\_\_  
**Signature and stamp** : \_\_\_\_\_  
**Date** : \_\_\_\_\_

**Validity of the Code of Conduct**

ANOXAL reserves the right to reasonably change the requirements of this Supplier Code of Conduct due to changes to the Company's Code of Conduct and Business Ethics. In such an event ANOXAL will inform their Business Partners and expects them to accept those reasonable changes.

## Sustainability Policy

ANOXAL commits to operate in a way that creates progress towards the UN Sustainable Development Goals. Through this commitment, ANOXAL seeks to help preserve the environmental, social and economic assets that are fundamental for society and important to our long-term value creation. ANOXAL builds on the contribution of their employees and fully integrate sustainability in their strategy, business plans, operations, aiming to maximise its positive effect by engaging with all business partners.

ANOXAL provides solutions and knowledge to the customers and business partners, supporting them to reach their sustainability ambitions directly and indirectly via industry initiatives to improve their sustainability performance. ANOXAL commits to meet society's current and future needs by seeking to provide low-carbon, circular and safe products with production operations that respect their employees, social partners and the environment.

ANOXAL commits to comply with all applicable laws and regulations and to work against corruption and bribery in all their forms. ANOXAL has zero tolerance for bribery, fraud, unfair competition and other types of inappropriate business behaviour. ANOXAL pledges to uphold sound business practices in their organisation and to promote such practices amongst their business partners.

ANOXAL commits to take action to combat climate change, as well as preserving natural resources that the companies rely on, promote recycling and circular economy to create more sustainable consumption and production, while at the same time seeking to maximize the utilization of secondary raw materials.

ANOXAL continuously strives to identify opportunities, risks, and improvement possibilities in the entire value chain from different perspectives, climate change, circular economy, resource management and respect for the environment and biodiversity.

ANOXAL commits to safeguarding labour and human rights, to promote safe working conditions, mental health and well-being, and giving their employees good learning and development opportunities in their work.

ANOXAL commits to treating all people with respect, to working against discrimination and harassment in all its forms and to being an inclusive organisation, which respects individual characteristics such as gender, age, sexual orientation, nationality, religious and political beliefs. ANOXAL strives to develop their employees to their fullest and to attract new talent in order to create a diverse and inclusive workforce with the right competencies.

Sustainability and more specifically environmental, social and governance issues, have many challenges, risks and opportunities in constant development. ANOXAL is committed to report on sustainability policies, targets and progress made and to engage with all stakeholders across the value chain to better understand how they can continuously improve their sustainability performance and contribute to a more sustainable world.

Accountability and responsibility to act in a socially responsible and sustainable manner is everyone's responsibility at ANOXAL. Responsibility for the implementation of this Policy lies with the most senior executive responsible for ANOXAL.