



**DEPT OF SUSTAINABILITY & ENVIRONMENT
QUALITY ASSURANCE DEPT
PROCUREMENT DEPT.**

JULY 2026

**Together,
We Grow,
Evolve and
Move Forward.**

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Opening Statement

At Epirotiki Bottling Industry (hereafter: EBI) we recognize that responsible business practices throughout our supply chain are essential to achieving our sustainability objectives and maintaining the trust of our stakeholders. We therefore expect all suppliers, contractors, and business partners to comply with the principles set forth in this Supplier Code of Conduct and to actively support continuous improvement in environmental, social, and governance (**ESG**) performance.

The following **ESG** criteria define the minimum standards and expectations applicable to all suppliers and business partners working with EBI. These requirements are intended to promote ethical conduct, respect for human rights, environmental stewardship, product safety, and regulatory compliance throughout our value chain. Suppliers are expected to implement appropriate policies, procedures, and management systems to ensure compliance with these requirements and to demonstrate their commitment through transparent communication and cooperation with EBI. We encourage our suppliers to go beyond compliance where possible and to contribute to sustainable and responsible business practices that create long-term value for society, the environment, and all stakeholders.

The **ESG** criteria covered by this Supplier Code of Conduct are:

- Legal Compliance and Business Integrity
- Social and Working Conditions
- Environment and Sustainability
- Food Safety and Quality
- Monitoring and Compliance

Compliance with these criteria forms the foundation of EBI's supplier relationships and supports our shared commitment to responsible, ethical, and sustainable business operations.

ESG Criteria

Environmental – Social – Governance

(The term “Suppliers/Business Partners” in the present document refers to Suppliers, Business Partners, Contractors, Subcontractors that provide work, products and services or act on behalf of EBI.

E S G



Environmental



Social



Governance

Our Vision and principles

Our vision is strongly supported by our values and principles. These define who we are and what we stand for, in the community and our partners. We respect natural resources hence we seek in growing in the most sustainable way. We share passion for our products and our people, superiority in developing new products and providing a continuously improving environment for our employees.

We motivate and innovate. Motivate, our employees by providing them encouragement and rewarding them to honor their success and achievements. Innovate, by using new technologies and creating new products. By preserving these values, we respect everyone, our people, our products, our planet, and the environment. We are defined by respect, integrity, and consciousness in everything we do and everyone we work with.

1. Our Approach: Scopes and Objectives

Epirotiki Bottling Industry S.A. (hereby “EBI”) is committed to conducting business responsibly, ethically, and sustainably. This Supplier Code of Conduct (“Code”) establishes the minimum standards and expectations that all suppliers, contractors, subcontractors, service providers, distributors, consultants, and other business partners (“Suppliers”) must comply with when conducting business with EBI.

Acceptance of and compliance with this Code, or equivalent standards, is a condition of doing business with EBI.

Our Suppliers are in turn expected to communicate these principles throughout their own supply chains and ensure that their subcontractors and suppliers comply with comparable standards.

2. Our values and commitment to our Suppliers and Business Partners

EBI's business is guided by integrity, respect, accountability, sustainability, innovation, motivation, and continuous improvement.

We seek long-term relationships with Suppliers and partners who also share our commitment to:

- Ethical business practices
- Respect for human rights
- Safe and healthy workplaces
- Environmental responsibility
- Product quality and safety
- Continuous improvement and transparency

EBI is committed to treating all Suppliers fairly, objectively, and transparently.

3. Supplier Selection and Business Integrity

3.1 Supplier Selection

EBI reserves the right to conduct integrity, compliance, financial, ESG, and reputational assessments before entering or renewing business relationships.

Supplier selection shall be based on objective criteria including:

- Quality
- Cost competitiveness
- Reliability
- Sustainability performance
- Compliance with applicable laws and regulations

3.2 Conflict of Interest

Suppliers should disclose any actual, potential, or perceived conflict of interest involving EBI employees, representatives, or business activities.

Suppliers should avoid situations where personal interests may interfere with objective business decisions.

4. Legal Compliance and Ethical Business Conduct

4.1 Compliance with Laws

Suppliers should comply with all applicable local, national, and international laws, regulations, permits, and industry standards governing their operations.

4.2 Anti-Bribery and Anti-Corruption

Suppliers should maintain zero tolerance for bribery, corruption, extortion, fraud, facilitation payments, and other improper business practices.

Suppliers should not offer, promise, give, solicit, or accept anything of value intended to improperly influence business decisions.

4.3 Gifts and Hospitality

Gifts, entertainment, and hospitality must:

- Be reasonable and infrequent.
 - Comply with applicable laws.
 - Never influence or appear to influence business decisions.
 - Never be offered during procurement, tender, or contract negotiations.
- Cash or cash equivalents are strictly prohibited.

4.4 Fair Competition and Fair Trade

Suppliers should comply with all competition and antitrust laws and should not engage in:

- Price fixing
- Bid rigging
- Market allocation
- Abuse of market position
- Unfair trade practices

4.5 Anti-Money Laundering

Suppliers should maintain controls to prevent money laundering, terrorist financing, and other financial crimes.

4.6 International Trade Compliance

Suppliers should comply with applicable trade sanctions, export controls, customs requirements, and embargo regulations.

4.7 Data Protection and Confidentiality

Suppliers should protect confidential information and personal data obtained through their relationship with EBI.

Collection, processing, storage, transfer, and use of personal data should comply with applicable privacy legislation.

4.8 Intellectual Property

Suppliers should respect intellectual property rights and protect EBI's proprietary information, trademarks, copyrights, trade secrets, and confidential business information.

5. Human rights and labor standards

EBI is committed to respecting internationally recognized human rights, including the principles of the United Nations Global Compact and the core conventions of the International Labour Organization (ILO).

5.1 Child Labor

Suppliers should not employ children below the minimum legal working age applicable in the country of operation. In Greece working under the age of 18yrs old is prohibited according to National Legislation. Under no circumstances shall child labor be tolerated.

5.2 Forced Labor and Human Trafficking

Suppliers shall prohibit:

- Forced labour.
- Bonded labour
- Prison labour
- Modern slavery
- Human trafficking

Employment shall be freely chosen.

5.3 Non-Discrimination and Equal Opportunity

Suppliers should provide equal employment opportunities and should not discriminate based on:

- Gender
- Age
- Race
- Ethnicity
- Nationality
- Religion
- Disability
- Sexual orientation
- Political opinion
- Any other protected characteristic

5.4 Harassment and Respectful Workplace

Suppliers should maintain workplaces free from:

- Harassment
- Bullying
- Violence (any type physical /verbal)
- Intimidation
- Abuse
- Retaliation

Employees shall be treated with dignity and respect.

5.5 Working Conditions

Suppliers should provide fair:

- Wages and benefits
- Working hours
- Rest periods
- Employment contracts

In accordance with applicable labour laws.

5.6 Freedom of Association

Suppliers shall respect employees' rights to freedom of association and collective bargaining in accordance with applicable laws.

5.7 Training and Development

Suppliers are encouraged to provide employees with ongoing training, awareness programs, and professional development opportunities.

6. Health and safety at work

Suppliers should provide safe and healthy workplaces and comply with all applicable occupational health and safety laws.

Suppliers shall:

- Identify workplace hazards
- Implement risk management systems
- Provide appropriate personal protective equipment (PPE)
- Conduct safety training
- Maintain emergency preparedness and response plans
- Investigate incidents and implement corrective actions

Suppliers should strive toward preventing workplace injuries, illnesses, and occupational diseases

7. Environmental sustainability (in 5 aspects)

Epirotiki Bottling Industry is committed to minimizing environmental impacts and promoting sustainable business practices.

Suppliers should support these objectives through responsible environmental management.

7.1 Environmental Compliance

Suppliers should obtain and maintain all required environmental permits, licenses, and approvals.

7.2 Energy and Climate

Suppliers are encouraged to:

- Monitor energy consumption in their operations
- Improve energy efficiency in the way they conduct their business
- Reduce greenhouse gas emissions
- Support climate-related initiatives

7.3 Water Stewardship

Suppliers are encouraged to use natural resources responsibly and seek opportunities to improve water efficiency and conservation, if possible, in their operations.

7.4 Waste and Chemicals Management

Suppliers should:

- Minimize waste generation
- Promote Reuse and Recycling
- Safely manage hazardous substances
- Prevent environmental contamination

7.5 Resource Efficiency and Circular Economy

Suppliers are encouraged to adopt practices that support sustainable resource use and circular economy principles.

8. Food Safety and Quality

Suppliers providing materials, ingredients, packaging, services, or products related to food and beverage production should maintain robust food safety and quality systems.

Suppliers should:

- Comply with applicable food laws and regulations
- Implement appropriate food safety management systems
- Maintain product traceability
- Support product recall procedures when required
- Ensure products meet agreed specifications and quality standards

Recognized standards such as ISO 22000, HACCP, BRCGS, IFS, ISO 9001, or equivalent certifications are encouraged where applicable.

9. Supply Chain Responsibility

Suppliers shall exercise due diligence throughout their supply chains.

Suppliers are expected to:

- Promote the principles of this Code to their suppliers
- Assess significant ESG risks
- Implement corrective actions where deficiencies are identified
- Support continuous improvement

9.1. Monitoring, Audience and Compliance

EBI reserves the right to verify Supplier compliance with this Code through:

- Self-assessment questionnaires
- Documentation reviews
- Certification reviews
- Remote audits
- On-site audits

Reasonable notice will normally be provided before on-site assessments.

Suppliers should cooperate fully with such assessments and provide accurate information.

Where deficiencies are identified, Suppliers shall implement corrective action plans within agreed timeframes.

9.2. Reporting Concerns and Whistleblowing

Suppliers are encouraged to report concerns regarding:

- Violations of this Code
- Illegal conduct
- Ethical misconduct
- Human rights violations
- Environmental incidents
- Fraud or corruption

Reports may be submitted through designated EBI reporting channels and will be handled confidentially to the extent permitted by law.

Retaliation against individuals raising concerns in good faith will not be tolerated.

9.3 Violations and Corrective Actions

Failure to comply with this Code may result in:

- Requests for corrective actions
- Enhanced monitoring
- Suspension of business activities
- Termination of contracts
- Removal from EBI's approved supplier list

The response will be proportionate to the severity and nature of the violation.

Supplier Acknowledgment and Certification

By accepting all the above stated the suppliers acknowledge acceptance of Epirotiki Bottling Industry's Supplier Code of Conduct and intention to comply with its requirements.

Epirotiki Bottling Industry

CEO, Mr. P. Sepetas
Signature:



The Supplier
Signature:
