ALPHABET
BY ZAMBELIS

Code of Conduct & Ethics

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INTRODUCTION

The ZAMBELIS SA Code of Conduct & Ethics (hereinafter the "Code") sets forth the core principles and offers guidance to the Board of Directors, the employees, the business partners, the auditors, and other affiliates/third parties working on behalf of or in the interest of the company (hereinafter "Stakeholders") regarding the standards of behaviour and ethical business practices expected of them. The Code ensures that all Stakeholders act with integrity, professionalism, and in alignment with the company's values and objectives.

The primary goal of the Code is to convey and promote the values that ZAMBELIS SA upholds and embraces across all levels, ensuring these values guide the actions, behaviours, and decisions of all its employees and partners.

ZAMBELIS SA aims to cultivate a culture of honesty, responsibility, and compliance with established rules. By combining common sense and sound judgment with the company's Code, Policies, and procedures, it creates a foundation for conducting business with integrity and ethical standards.

The Quality Policy[1] and the Environmental Policy[2] of the company are in alignment and act complementary with the Code, to ensure that all practices, operations and actions of the company truly reflect its core principles, purpose and mission.

While the Code cannot foresee every possible workplace scenario, it serves as a valuable tool to guide ethical and informed decision-making. All employees are expected to adhere to this Code in the workplace and when representing the company in any other context.

[1] https://www.zambelislights.gr/en-gb/quality-policy.html

[2] https://www.zambelislights.gr/en-gb/environmental-policy.html

1. Purpose, Mission & Values

At Zambelis Lights S.A., our **vision** is a world where lighting is not just a technical solution but a vital tool that enhances every space, improves daily life, and promotes sustainability. We aspire to contribute actively to modern architecture and design through lighting solutions and products that continuously integrate cutting-edge technology and evolve in line with human and environmental needs.

The **purpose** of Zambelis Lights S.A. is to provide reliable lighting solutions for every type of environment, addressing the vision and requirements of each client. Since 1967, we have been building strong foundations of quality, expertise, and craftsmanship, with the aim of creating products that combine aesthetics and performance.

Our **mission** is to design and manufacture lighting fixtures that meet today's needs, integrating innovative technologies, high-quality materials, and solutions with a low environmental footprint. Through responsible practices and continuous improvement, we strive to deliver lighting that enhances the functionality of spaces and elevates the overall experience of the people who use them.

We are dedicated to maintaining exceptional quality and embracing cutting-edge technology, aiming to create meaningful emotional connections and elevate human experiences through our lighting solutions. Our approach is both customer-centric and innovative, grounded in design excellence, aesthetic quality, and rigorous standards of craftsmanship.

Regarding our **values,** ZAMBELIS SA recognises that the **Sustainable Development Goals**[3] set by the UN represent a global challenge, for which all businesses have a crucial role to play. Therefore, our company is committed to do business responsibly and ethically, seeking to align its strategies and operations with the **ten Principles of the UN Global Compact**[4], to monitor and improve its footprint on human rights, labour rights, environmental performance and anti-corruption prevention during its operations. Our **values** include:

- **Respect** for all business partners along our value chain, including end-customers and regulatory authorities. ZAMBELIS SA promotes a culture of **inclusion, diversity and equity** in all our interactions.

- **Innovation, customization, flexibility**, to meet each customer's expectations and vision and to implement **high quality standards** in all our products.

- **Responsibility** regarding the **environmental footprint** of our operations and the development of our products. We are committed to minimizing our sustainability footprint by integrating energy-efficient technologies and eco-friendly materials into our lighting solutions.

[3] https://sdgs.un.org/goals
[4] https://unglobalcompact.org/what-is-gc/mission/principles

2. Rules of Conduct

2.1 General Rules

All Stakeholders have the following obligations:

- **Compliance with Laws and Regulations:** Always adhere to the laws, regulations, and licensing requirements that are relevant to Zambelis SA's business activities.
- **Adherence to the Code of Conduct:** Conduct all daily tasks and interactions in accordance with this Code of Conduct, ensuring alignment with the company's ethical standards.
- **Honesty and Integrity:** Act with honesty, integrity, and transparency in all interactions, both internal and external, including with colleagues, customers, authorities, and other stakeholders.
- **Respect for Human Rights:** Treat all individuals with respect, upholding their human rights and ensuring no discrimination on any grounds.
- **Equal Opportunity and Inclusion:** Actively promote equal opportunity and inclusion for all employees and collaborators through fair policies and practices.
- **Value Diversity:** Recognize, respect, and embrace diversity in all aspects of operations, encouraging a culture of mutual respect and understanding.
- **Environmental Responsibility:** Ensure alignment with the company's Environmental Policy and follow the relevant environmental procedures to minimize our ecological impact.
- **Confidentiality and Privacy:** Safeguard and respect the confidentiality of all company, employee, and customer information, ensuring that such data is handled responsibly and securely.

2.2 Relations with Customers and Suppliers

Employees at Zambelis SA are expected to conduct themselves with willingness, professionalism, and courtesy in all interactions with customers, suppliers, and representatives. Their behavior should reflect the company's reputation and prestige, promoting its services effectively and positively. The company's primary mission is to ensure customer satisfaction through honesty, ethics, and professionalism, adhering to the highest standards in all dealings.

Zambelis SA strictly avoids actions that violate competition laws, including but not limited to:

- **Unethical Practices:** Employees must uphold a strong work ethic, ensuring compliance with all applicable laws and regulations. Any non-compliance with laws and ethical standards is strictly prohibited.
- **Exchange of Competitive Information:** The company does not engage in the exchange of sensitive competitive information or any agreements that could distort market competition, such as colluding on prices, sales volume, market share, customer areas, or other factors.
- **Unfair Commercial Practices:** Zambelis SA refrains from unfair business practices, including providing misleading or deceptive information about products, such as overstating their

characteristics or performance. This includes avoiding greenwashing in advertising and marketing activities, ensuring all claims made are truthful and substantiated.

- **Aggressive Commercial Practices:** The company does not tolerate aggressive commercial tactics, such as harassment, coercion, or undue influence, which could compromise the fair treatment of others in business transactions.

In dealings with product and service suppliers, employees at Zambelis SA are expected to:

- **Supplier Selection:** Select suppliers based on objective criteria, including the quality, pricing, and value of products and services, ensuring fairness and transparency in the procurement process.
- **Contractual Compliance:** Comply with all contractual obligations and legal requirements in dealings with suppliers, maintaining professionalism and trustworthiness.
- **Fostering Positive Relationships:** Cultivate relationships with suppliers that reflect commercial best practices, demonstrating mutual respect and professionalism.
- **Impartiality and Integrity:** Ensure all dealings with suppliers are conducted impartially and transparently, adhering to applicable laws and regulations, and avoiding conflicts of interest or the improper use of their position.

By adhering to these principles, Zambelis SA commits to upholding the highest ethical standards, fostering a culture of respect, fairness, and trust in every aspect of its operations.

2.3 Responsibilities of Management and Directors

The Management (BoD) and Directors of the company are expected to lead by example, upholding the Code's principles and fostering trust and teamwork.

Management and Directors are entrusted with upholding the company's standards of integrity, accountability, and professionalism. Their core responsibilities include:

- **Serve the company's mission and purpose:** promote the commercial targets and ambitions of the company and its development in both domestic and international markets.
- **Cultivating an Ethical Culture:** Establish and sustain a workplace environment rooted in integrity, transparency, and mutual respect for all employees, partners, and stakeholders.
- **Leading by Example:** Model ethical behavior by consistently upholding the company's values, policies, and code of conduct.
- **Ensuring Compliance:** Proactively enforce compliance with all applicable laws, regulations, and internal policies, ensuring the Code of Conduct is observed at all times.
- **Risk Management:** Identify, evaluate, and manage risks to the organization's operations, employees' health and safety, company's finances and reputation, implementing preventive, training and corrective actions as necessary.
- **Encouraging Transparent Reporting:** Foster an open environment where employees can report concerns or unethical behavior without fear of retaliation, reinforcing transparency and accountability.

- **Decision-Making Accountability:** Make decisions objectively and in the best interests of the company, with a commitment to accountability and fairness.
- **Conflict of Interest Prevention:** Disclose and manage any actual or potential conflicts of interest to prevent any compromise in professional judgment or integrity.
- **Resource Stewardship:** Protect and manage the company's assets, resources, and confidential information responsibly.
- **Promoting Diversity and Inclusion:** Actively support an inclusive culture that values diverse perspectives and ensures equal opportunities for all employees.
- **Ongoing Development:** Engage in continuous training related to ethics, compliance, and leadership to stay equipped for effective decision-making and management. Review and improve the Quality Management System and the Environmental Management System of the company.

2.4 Responsibilities of Employees

All employees and partners of Zambelis SA are required to comply with the company's Code of Conduct as well as all relevant local laws and regulations in their professional actions. Acting in the company's best interests never justifies violating the Code's principles. Adherence to these principles ensures the company maintains a strong ethical foundation and reputation for integrity.

All employees are expected to uphold the highest standards of ethics and professionalism in every aspect of their work. Key responsibilities include:

- **Commit to Ethical Behaviour:** Employees must consistently act in a manner that reflects the company's core values, policies, and the Code of Conduct. This includes not only adhering to legal and regulatory requirements but also ensuring that decisions and actions reflect honesty, fairness, and accountability in all business practices.
- **Treat Others with Respect and Professionalism:** Every employee is expected to contribute to a positive, collaborative, and respectful work environment. This means treating colleagues, clients, and all stakeholders with dignity, fairness, and professionalism, fostering mutual respect and trust across all levels of the organization.
- **Report Unethical Conduct:** Employees have a responsibility to promptly report any suspected unethical behaviour or violations of the Code of Conduct, company policies, or legal regulations. We provide mechanisms for employees to report concerns without fear of retaliation or retribution, ensuring a safe and transparent environment for raising issues.
- **Maintain Confidentiality:** Employees must respect and protect the confidentiality of all sensitive company and customer information. Information should only be shared with authorized individuals and must not be disclosed inappropriately.

- **Avoid Conflicts of Interest:** Employees must disclose any potential or actual conflicts of interest and refrain from situations where personal interests could interfere with professional duties.

- **Use Company Resources Wisely:** Employees should utilize company assets, including time, materials, and financial resources, responsibly and efficiently for legitimate business purposes. Misuse of company resources for personal benefit is strictly prohibited and will be addressed accordingly.

- **Comply with Laws and Policies:** every employee shall comply with all applicable local, national, and international laws, regulations, and internal policies that apply to their work and the company's activities.

- **Engage in Ongoing Training and Development:** Employees are encouraged to pursue continuous learning and professional development opportunities to enhance their skills and stay abreast of industry trends and regulatory changes. The company supports and provides resources for ongoing training to empower employees in their roles and responsibilities.

- **Promote Workplace Safety:** Ensuring a safe work environment is a shared responsibility. Employees must follow all established safety protocols, immediately report any hazards or safety concerns, and take action to prevent accidents and injuries. Employees are expected to contribute to a culture of safety by following guidelines and assisting in maintaining a secure work environment for themselves and their colleagues.

- **Support Diversity and Inclusion:** Employees are expected to value and respect diverse perspectives, backgrounds, and experiences. Every individual should be treated with dignity and respect, and everyone must contribute to fostering an inclusive environment where all employees feel welcome and valued.

- **Act with Integrity and Accountability:** Employees are expected to take personal responsibility for their actions and uphold the highest level of integrity in all circumstances. This includes taking ownership of both successes and mistakes and addressing any issues with transparency and a proactive mindset.

- **Commitment to Teamwork:** Collaboration is at the heart of our success. Employees are encouraged to work together, share knowledge, and support each other in achieving the company's goals.

- **Lead by Example:** Employees, particularly those in leadership positions, are expected to lead by example, setting the standard for ethical behavior and work ethics. Leaders are role models for the rest of the organization, and their actions should consistently reflect the principles and values of the company.

2.5 Prevention of Conflict of Interest

A **conflict of interest** occurs when an employee's personal interests, relationships, or financial interests interfere with or appear to interfere with their ability to perform their duties impartially, professionally, and effectively. To ensure transparency, fairness, and the protection of the company's reputation, the following guidelines must be adhered to by all employees at Zambelis SA:

Guidelines for Avoiding Conflict of Interest:

- **Prohibition on Financial Benefits:** Employees must not accept, directly or indirectly, any financial benefit, gifts, or incentives from suppliers, competitors, or any third party that may influence or appear to influence their objectivity and decision-making. This includes monetary compensation, services, or any form of preferential treatment that could impact their professional judgment or duties.
- **Disclosure of Outside Work:** Employees are prohibited from taking on additional work or projects from a customer, supplier, or competitor that could potentially interfere with their responsibilities at Zambelis SA. Prior approval from the company is required before engaging in such activities. This ensures that there is no overlap or interference with the employee's role, duties, or the company's best interests.
- **Disclosure of Relationships:** If an employee has any personal, familial, or professional relationship with a customer, supplier, or competitor they will be working with, this must be disclosed to the company. Relationships—whether personal, friendly, or professional—that could be perceived as a conflict of interest must be transparently communicated to management to ensure fairness in decision-making processes.
- **Engagement in Lawful Outside Work:** While employees are permitted to engage in lawful work outside of Zambelis SA, such work must not interfere with their primary responsibilities, the confidentiality of company information, or their working hours. Any outside employment or business ventures should not negatively impact the employee's performance, focus, or dedication to the company's operations.
- **Notification of Conflicts (Actual or Potential):** Employees must notify the company management immediately if they become aware of any actual, potential, or perceived conflict of interest. Early disclosure allows the company to assess the situation and take appropriate measures to ensure the integrity of business operations and decision-making.

Management of Conflicts:

- **Investigation and Resolution:** Upon notification of a conflict of interest, whether actual or potential, the company will investigate the situation impartially. Depending on the circumstances, actions may include reassignment of duties, recusal from decision-making processes, or other corrective actions to mitigate any negative impacts on the company and ensure business continuity.
- **Preventive Measures:** Zambelis SA will take proactive steps to minimize conflicts of interest by providing clear guidelines, conducting regular ethics training, and encouraging employees to ask for advice or clarification in situations where they may be uncertain about potential conflicts.

3. Compliance & Reporting

3.1 Anti-Bribery & Anti-Corruption Policy

Zambelis SA, along with its Management, Directors, Employees, and all those bound by this Code of Conduct, is fully committed to maintaining the highest standards of integrity, honesty, and fairness in all internal and external relationships, in alignment with both national and international anti-corruption laws and regulations.

The company has a **zero-tolerance** policy towards any form of corruption[5], including bribery[6] , involving public officials, third parties associated with public officials, or any other individual or entity, whether conducted domestically or internationally.

Policy Guidelines:

- **Prohibition of Bribery and Corruption:** No member of Management, Director, Employee, or Representative of Zambelis Lights SA is allowed to:
    - Accept, request, offer, or pay any form of bribe, whether monetary or otherwise, directly or indirectly, to representatives of other companies in the company's value chain, or public servants, even if under unlawful pressure.
    - Engage in any corrupt practices under any circumstances, even when subjected to unlawful pressure or coercion.
- **Accurate Documentation of Transactions:** All financial records, transactions, and dealings must be truthful, transparent, and accurately recorded. Employees are expected to ensure that every business transaction is documented in compliance with legal and regulatory requirements, reflecting the true nature of the transaction.

Reporting and Accountability:

- **Reporting Bribery or Corruption:** Any employee, director, or representative of Zambelis Lights SA who becomes aware of any act of bribery or corruption, or suspects that such acts may have taken place, must report the matter immediately through the company's designated reporting channels. These channels are confidential, ensuring that employees can raise concerns without fear of retaliation.
- **Investigation and Consequences:** All reported incidents of bribery or corruption will be thoroughly investigated. If evidence of bribery or corruption is found, the company will take appropriate disciplinary action, which may include termination of employment, legal action, and cooperation with authorities for further legal proceedings.
- **Training and Awareness:** Zambelis Lights SA provides regular training to all employees, management, and relevant third parties to ensure a full understanding of anti-bribery and anti-corruption policies, and to reinforce the company's commitment to ethical business

[5] Corruption: the abuse of power for private gain, leading to dishonest or illegal behavior.
[6] Bribery: offering, promising, giving, accepting or soliciting of an undue advantage of any value, directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to his/her professional duties.

practices. Employees are encouraged to seek clarification on any aspect of the policy if they are uncertain about their obligations.

3.2 Preventing Fraud

All members of the management, along with executives, employees, and partners of Zambelis Lights SA, are expected to understand what constitutes fraud and take all necessary precautions to avoid engaging in or facilitating actions that could lead to unethical behavior. This includes recognizing attempts to circumvent or undermine the company's internal control mechanisms.

Fraud is defined as any action or failure to act by an individual who, with the intent to gain unlawful financial benefit for themselves or a third party, causes harm to another's property by knowingly presenting false information as true or by improperly concealing or misrepresenting true information.

Fraudulent behaviour includes, but is not limited to:

- Falsifying or tampering with company records, checks, accounts and financial documents.
- Misusing company funds, assets, or resources.
- Misreporting financial transactions or manipulating financial statements.
- Engaging in theft or dishonest activities, such as stealing company property or resources.
- Damaging, destroying, or stealing company documents, property, or equipment.

Policy Guidelines:

- **Prohibition of Fraudulent Activities:** Fraudulent actions are strictly prohibited under all circumstances.
- **Internal Control Mechanisms:** Zambelis Lights SA is developing internal control procedures to prevent and detect fraudulent activities. Employees are required to comply with all control mechanisms and reporting procedures designed to safeguard the integrity of company operations.

Reporting Fraudulent Activity:

All employees, executives, and partners have a responsibility to report any suspicion or evidence of fraud. Reports should be made to the designated channels within the company, which ensure confidentiality and protection from retaliation for whistleblowers.

- **Investigation and Accountability:** All reported incidents of fraud will be thoroughly investigated by the appropriate internal or external authorities. Employees found to be involved in fraudulent activities will be subject to appropriate disciplinary actions, including termination, legal proceedings, and restitution.
- **Training and Awareness:** Zambelis Lights SA will provide ongoing training for all employees, management, and partners to ensure a clear understanding of what constitutes fraud and how to prevent it. All stakeholders will be informed about the company's policies and the procedures for reporting fraudulent activities.

3.3 Reporting Procedures and Whistleblowing Policy

ZAMBELIS SA is committed to safeguarding the identity of whistleblowers. All reports will be handled with the utmost confidentiality, and the identity of the individual providing the information will not be disclosed to anyone other than authorized personnel without the explicit consent of the whistleblower.

Whistleblowers are protected under applicable EU law (Chapter 6 of Directive EU 2019/1937) from civil, criminal, or administrative liability related to their report, and any labor-related repercussions or retaliatory actions are strictly prohibited.

In accordance with **EU Directive Article 9 (Directive EU 2019/1937)**, ZAMBELIS SA has established a clear procedure for managing whistleblower reports, ensuring that all submissions are handled fairly and transparently.

- **Submission of Reports:**
    - Reports can be submitted through a designated independent reporting system, at the email complaints@zambelislights.gr . This system is separate from the company's regular IT infrastructure to ensure anonymity and security.
- **Documenting the Report:**
    - Once a report is received, it will be properly documented and stored securely to ensure that no sensitive information is lost or compromised.
- **Acknowledgment of Receipt:**
    - The party designated to examine whistleblowers reports, will acknowledge receipt of each whistleblower's report within **seven (7) days**.
- **Impartial Follow-Up Actions:**
    - An impartial third party, namely a designated law firm, is assigned to handle follow-up actions related to the report. This ensures an unbiased investigation and resolution process.
- **Investigation and Inquiry:**
    - The designated party will conduct thorough internal investigations or other relevant inquiries into the reported issue, as required. All actions will be performed transparently and in accordance with company policies and legal requirements.
- **Whistleblower Updates:**
    - The whistleblower will be kept informed throughout the follow-up process. Comprehensive updates will be provided to ensure transparency and to keep the whistleblower aware of the status of the investigation or action being taken.

ZAMBELIS SA has a **zero-tolerance policy** for any form of retaliation or discrimination against whistleblowers. Any actions taken against individuals who report violations, including negative impacts on employment status or working conditions, will be treated as serious violations of company policy and will lead to disciplinary action.

4. Organizational Culture and Values

4.1 Health and Safety in the workplace

At Zambelis Lights SA, health and safety are critical to ensuring a productive and secure work environment. Employees must adhere to safety guidelines, including using protective equipment, following safety protocols, and attending mandatory training sessions. Regular inspections and assessments are conducted to maintain safety standards and address any potential hazards.

Employees are encouraged to contribute to a culture of safety by being aware of their surroundings and supporting colleagues in maintaining a safe environment. The use of alcohol or drugs in the workplace is strictly prohibited, as it may prevent employees from carrying out their tasks safely and adequately. Any unsafe conditions or conducts must be reported immediately to prevent accidents. A shared responsibility for safety helps minimize risks and ensures that everyone can perform their duties without harm.

For the implementation of all health and safety measures, the close cooperation of the Management and employees with the Safety Engineer of the company is required.

4.2 Mental Health and Well-being

At **Zambelis SA**, we recognize the importance of mental health and overall well-being in creating a productive and supportive workplace. We believe that a healthy and balanced workforce is integral to both individual success and the success of the company. As part of our commitment to fostering a positive, inclusive, and safe environment, we have established the following principles:

Work-Life Balance

We understand that maintaining a positive work-life balance is essential for mental and physical health. Employees are encouraged to manage their time effectively and to prioritize both their professional and personal well-being. A balanced lifestyle is key to reducing stress, boosting productivity, and promoting long-term health and satisfaction. Zambelis SA makes sure that the working environment and working timetable of each employee facilitates them to maintain a healthy work-life balance.

A Respectful, Safe, and Inclusive Work Environment

Zambelis SA is dedicated to creating and maintaining a respectful, inclusive, and safe workplace for all employees. We actively foster an environment where everyone feels valued, supported, and free to express themselves. This includes ensuring that:

- **Open Communication**: Employees are encouraged to communicate openly about any challenges they may face, including mental health concerns. We believe that an open dialogue is essential in reducing stigma around mental health and enabling employees to seek support when needed.
- **Management's Responsibility**: Management members and Directors are responsible for ensuring that mental health is prioritized within the workplace and that employees are supported. Management must also lead by example in promoting a healthy work-life balance and addressing any issues related to well-being.

Harassment and Misconduct Prevention

We are committed to upholding a safe and respectful work environment that is free from all forms of harassment and misconduct, including **sexual harassment** and **mobbing**.

1. **Sexual Harassment and Misconduct**:
    - Sexual harassment, unwelcome advances, inappropriate behaviour, or any form of sexual misconduct will not be tolerated at Zambelis Lights SA.
2. **Workplace Mobbing**:
    - Mobbing, or any form of bullying or harassment in the workplace, is strictly prohibited. Any behaviour that undermines an individual's dignity or infringes on their rights will be met with serious consequences.
3. **Zero Tolerance**:
    - Any behaviour that compromises the dignity, respect, and rights of others goes against our core values. Employees, directors, and partners must treat one another with courtesy and respect, and any violation of this policy will result in appropriate disciplinary actions.

Reporting Procedures

To ensure that concerns regarding harassment, misconduct, or any mental health-related challenges are addressed appropriately, we have established clear reporting procedures:

- **Confidential Reporting**: Employees are encouraged to report any concerns related to harassment, sexual misconduct, or any other issues affecting mental well-being. The company has a designated confidential reporting system, via the e-mail address complaints@zambelislights.gr, that ensures that all complaints are treated with care, sensitivity, and in a timely manner. All harassment and sexual misconduct complaints are examined by a designated law firm, ensuring an unbiased investigation and resolution process.
- **Support for Affected Individuals**: Employees who report such concerns will be provided with the necessary support and protection against retaliation. For this purpose, the HR is informed about any complaints and ensures that the company takes all reasonable steps to address the situation and protect the well-being of all parties involved.

5. Sustainability & Environmental Responsibility

5.1 Commitment to Reducing Environmental Impact

Reducing environmental impact is a priority at Zambelis Lights SA, with a focus on minimizing waste, conserving energy, and adopting sustainable practices across all operations. Employees are expected to follow the Environmental Policy and the Environmental Management System of the company, including reducing unnecessary resource use and adhering to recycling protocols. Continuous efforts are made to improve resource efficiency and lower carbon emissions, aligning with the company's sustainability goals.

Compliance with environmental regulations is mandatory, and any potential risks to the environment must be reported promptly. Employees are also encouraged to participate in sustainability initiatives that promote environmental protection both within the company and the community.

5.2 Sustainable Resource Use

Sustainable resource use is essential for long-term environmental stewardship at Zambelis Lights SA. Employees must prioritize efficient use of materials, minimize waste, and reduce consumption where possible. This includes proper disposal of materials and following recycling guidelines to ensure resources are reused wherever feasible.

Innovation in resource management is encouraged, and employees should look for ways to improve sustainability in their daily tasks. Collaboration with suppliers and customers ensures that sustainability is considered throughout the supply chain, contributing to a greener future.

5.3 Care for the Environment and the Community

At Zambelis SA, we are deeply committed to making a positive and lasting impact on both the environment and the communities where we operate. As part of our corporate responsibility, we strive to balance business success with meaningful contributions to society and the planet. This commitment drives our actions to promote sustainability, engage in community development, and foster a culture of environmental stewardship.

We recognize that our operations impact the environment, and we are dedicated to minimizing this impact through sustainable business practices. Our approach to environmental responsibility is described in our Environmental Policy and implemented via our Environment Management System, which is certified under ISO 14001:2015 scheme.

Encouraging Employee Engagement in Environmental & Social Initiatives

At Zambelis SA, we believe that every individual has the power to contribute to positive change. The company provides to employees the opportunity to participate in environmental and social initiatives, such as:

- **Volunteer Work** that supports local communities, environmental protection, and sustainability efforts.

- **Environmental Clean-up** campaigns and other activities, designed to protect and preserve the environment.
- **Conservation Efforts:** participation in programs that help protect wildlife and natural ecosystems.

These activities not only contribute to environmental protection and community development but also align with the values that Zambelis Lights SA upholds as a responsible corporate entity.

Building Strong Relationships with Local Communities

Zambelis SA recognizes the importance of building strong, mutually beneficial relationships with the communities in which we operate. Our efforts to support local communities include:

- **Local Partnerships:** We seek to form partnerships with local organizations, charities, and social enterprises to support initiatives that drive positive change in social, environmental, and educational sectors.
- **Community-based Projects:** The company sponsors community-based projects that aim to solve pressing local issues such as poverty, education, and environmental conservation, aiming to create lasting social value.

6. Data Privacy and Protection

6.1 Protection of Personal and Customer Data

At **Zambelis Lights SA**, we recognize the critical importance of protecting personal and customer data. Safeguarding privacy and confidentiality is a fundamental aspect of our business operations. We are fully committed to complying with all applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR), to ensure that all sensitive information is handled securely and responsibly.

Key Principles for Data Protection

1. **Confidentiality and Security**: Personal and customer data must always be kept confidential and secure. Access to such data should be restricted to authorized individuals only and stored in a way that prevents unauthorized access, disclosure, alteration, or destruction.
2. **Authorized Access Only**: Data should only be accessed by employees or partners who require it for legitimate business purposes. Employees must ensure that data is shared only with authorized parties and that any communication involving personal data complies with our internal policies.
3. **Data Minimization**: We collect only the data that is necessary to fulfil the purpose for which it was collected. Personal and customer data should not be stored longer than needed for business purposes and should be disposed of properly when no longer required.
4. **Data Accuracy**: Zambelis SA ensures that all personal and customer data collected is accurate, up to date, and kept current. Employees are encouraged to update data promptly when necessary to avoid inaccuracies.
5. **Transparency and Consent**: All data collection must be transparent to the individual whose data is being collected. Where required, the company will obtain explicit consent before processing personal data, and individuals will be informed of how their data will be used.

Handling of Personal and Customer Data

- **Storage and Access**: Sensitive data must be stored in secure systems, either physical or digital, with appropriate access controls. Any sensitive data stored on paper must be securely locked away, and digital data should be encrypted and backed up regularly.
- **Sharing of Data**: Personal and customer data must not be shared with unauthorized third parties. If sharing data is required, it must be done in accordance with legal requirements and company policies, ensuring that data is shared only with trusted and verified partners.
- **Incident Reporting**: In the event of a data breach or suspected breach, employees must immediately report the incident to the designated Data Protection Officer (DPO) or relevant authority. Prompt reporting ensures that necessary actions can be taken to mitigate the impact of the breach and comply with applicable data protection regulations.

Employee Responsibilities in Data Protection

- **Training and Awareness**: Regular training is provided to all employees to ensure they understand their responsibilities concerning data protection. This includes understanding the security protocols in place, the importance of safeguarding personal and customer data, and how to handle sensitive information correctly.
- **Compliance with Policies**: Employees must adhere to the company's data protection policies and any specific protocols or guidelines outlined by the legal department or the Data Protection Officer (DPO).
- **Safeguarding Data**: Employees must take reasonable steps to safeguard data from potential threats, such as phishing attacks or unauthorized access. This includes using secure passwords, logging off from systems when not in use, and being cautious when handling personal data.

Data Breach Protocol

In the event of a data breach, Zambelis SA has implemented the following procedures:

- **Immediate Notification**: Employees must notify the company's Data Protection Officer (DPO) as soon as a data breach is identified.
- **Investigation and Action**: The DPO will lead an investigation to assess the severity of the breach, the type of data involved, and potential risks to individuals. Necessary actions will be taken to contain the breach and mitigate its effects.
- **Notification to Authorities**: If required by law, the company will notify the relevant supervisory authority within the stipulated time frame, generally within 72 hours of the breach.
- **Notification to Affected Individuals**: If the breach poses a high risk to the affected individuals, they will be notified promptly.
- **Record Keeping**: Even if the incident cannot pose a risk to the individuals concerned, in which case the submission of the above notification to the Authority is not required, the DPO must record it and maintain its own internal file.

Ongoing Monitoring and Improvements

Zambelis Lights SA will continuously monitor data protection practices, ensuring they align with industry standards and legal requirements. Regular audits and reviews will be conducted to identify areas for improvement and maintain the highest level of data security.

6.2 Compliance with Data Protection Laws (e.g., GDPR)

Compliance with data protection laws, such as GDPR, is mandatory at Zambelis SA. Employees must ensure that all personal data is handled in accordance with these regulations, from collection to disposal. Any use of personal data must be justified and limited to what is necessary for business operations. Employees are required to stay informed about changes in data protection laws and seek guidance if unsure about their responsibilities. In order to achieve that, the company provides information resources and training to employees. Compliance helps maintain trust with customers and partners, while avoiding legal risks.

7. Human Rights and Labor Standards

7.1 Adherence to International Human Rights Standards

Adherence to international human rights standards is strictly enforced at Zambelis SA. The company prohibits any involvement in unethical practices such as child labor, forced labor, or exploitation. Employees must report any concerns related to human rights violations immediately.

Collaboration with suppliers and partners is essential in upholding these values, ensuring human rights are respected throughout the supply chain. Employees working with external partners must engage responsibly to prevent indirect involvement in human rights violations.

7.2 Fair Labor Practices

Fair labor practices are integral to creating an equitable workplace at Zambelis SA. Freedom of association is respected by the company, in accordance with the relevant legislation.

Gender equity, inclusion, and diversity are prioritized, and employees must contribute to an environment where individuals are treated with respect, regardless of background. Discrimination or harassment of any form is not tolerated, and concerns must be reported promptly.

Fair wages, working hours, and opportunities for career advancement are equally important. Employees should expect to be treated fairly, with equal access to opportunities for growth and success in their roles. The company ensures equal pay for equal work for all employees, despite their gender and implements inclusive recruitment policies that embrace diversity across gender, age, religion, and sexual orientation.