ALPHABET
BY ZAMBELIS

Supplier Code of Conduct

2025

1. Introduction

This **Supplier Code of Conduct** outlines the expectations and standards that Zambelis SA requires from all its suppliers and business partners. These principles reflect the values and ethical commitments stated in Zambelis SA's **Code of Conduct & Ethics 2024**[1], Environmental Policy, and Quality Policy, extending them across the supply chain.

This Code is an integral part of all contractual agreements between Zambelis SA and its suppliers and business partners.

2. Principles and Policies

ALPHABET by Zambelis is committed to conducting business responsibly and ethically, seeking to align its strategies and operations with the Ten Principles of the UN Global Compact[2] , to monitor and improve its impact on human rights, labor rights, environmental performance and anti-corruption efforts during its operations.

2.1 Human Rights, Labor Standards, and Inclusion

Zambelis SA expects its suppliers to uphold internationally recognized human rights and labor standards, aligning with frameworks such as the **UN Guiding Principles on Business and Human Rights** and the **ILO Core Conventions**. Key expectations include:

- **Prohibition of Child Labor**: Suppliers must strictly prohibit child labor in any form.
- **Fair Labor Practices**: Ensure fair wages, reasonable working hours, and the right to freedom of association.
- **Diversity, Equity, and Inclusion**: Promote an inclusive workplace free of harassment and discrimination.
- **No Forced Labor**: Prevent all forms of forced labor, human trafficking, and exploitation.
- **Safe and Healthy Workplaces**: Implement and maintain high standards of health and safety, including regular risk assessments and the use of protective equipment.

2.2 Environmental Responsibility and Sustainability

Zambelis SA is committed to reducing its environmental impact and expects its suppliers to share this commitment. Suppliers are expected to:

- **Reduce Environmental Impact**: Implement measures to minimize waste, conserve energy, and reduce greenhouse gas emissions.

[1] https://www.zambelislights.gr/en-gb/code-of-conduct/
[2] https://unglobalcompact.org/what-is-gc/mission/principles

- **Sustainable Resource Use**: Promote the use of eco-friendly materials and adopt circular economy practices.
- **Biodiversity Protection**: Avoid activities that cause significant harm to biodiversity and ecosystems.
- **ISO Certification Alignment**: Strive to align with environmental management systems like ISO 14001.

2.3 Business Ethics

Suppliers must establish procedures and measures to prevent and combat fraudulent behavior on their part, their employees, and their direct upstream suppliers. In detail:

- **Anti-Bribery and Corruption**: Maintain a zero-tolerance approach to corruption, bribery, or unethical practices. Suppliers must not offer or accept improper payments, gifts, or benefits to gain unfair advantages.
- **Fair Competition**: Avoid anti-competitive behaviors such as price-fixing or collusion.
- **Transparent Transactions**: Ensure that all financial dealings are accurate and compliant with legal and regulatory requirements.

Suppliers may report suspected fraudulent behavior related to their cooperation with ALPHABET by Zambelis through a designated independent whistleblowing system at complaints@zambelislights.gr. This system is separate from the company's regular IT infrastructure to ensure anonymity and security.

Additionally, suppliers must ensure that neither they nor their employees have any **conflicts of interest** while conducting business with ALPHABET by Zambelis. If a supplier discovers a conflict of interest, they must report it to ALPHABET by Zambelis without delay

3. Governance, Monitoring, and Reporting

3.1 Due Diligence and Audits

- All suppliers must comply with national and international laws and regulations in their countries of operation, as well as this Code of Conduct, and must ensure these standards are upheld by their upstream suppliers.
- All Suppliers are expected to regularly conduct Risk Assessments to identify risks and areas for improvement, related to the issues included in this Code of Conduct. Suppliers should promptly address identified non-compliance issues and areas for improvement promptly and take corrective actions.
- Suppliers should establish confidential reporting mechanisms that allow employees and business partners to report unethical behavior, violations, or safety concerns without fear of retaliation.

Suppliers are expected to thoroughly investigate such reports and take corrective action when needed.

- Zambelis SA reserves the right to conduct audits, inspections, or request documentation to verify compliance with this Code. Suppliers are expected to cooperate fully with audits and provide transparent and accurate records.

4. Data Protection and Cybersecurity

Suppliers must protect sensitive information in compliance with data protection regulations such as the **GDPR**. They are expected to:

- Implement robust cybersecurity measures to prevent data breaches and unauthorized access.
- Regularly update systems and train employees in cybersecurity best practices.
- Notify Zambelis SA immediately in the event of a data breach that concerns the company.

5. Acceptance and Acknowledgment

This Code of Conduct is binding for all suppliers of ALPHABET by Zambelis. Suppliers should acknowledge and accept its principles and ensure their integration into their operations and across their own upstream suppliers. Periodic updates to this Code will be communicated, and suppliers are expected to remain in compliance.

Acknowledgement of the Supplier/ Business partner:

COMPANY	
NAME OF SIGNATORY	
POSITION	
DATE	
SIGNATURE	