

# Code of Conduct for Suppliers & Partners

## Preamble

The companies of the Group (Hellenic Exchanges – Athens Stock Exchange S.A. [“ATHEX”], Athens Exchange Clearing House S.A. [“ATHEXClear”], Hellenic Central Securities Depository S.A. [“ATHEXCSD”]) (hereinafter the “Group”) acknowledge their responsibility in issues relating to society and the environment, as well as in matters of corporate governance, and are committed to adopting ethical and socially responsible standards of business conduct, acting with integrity in the course of their collaboration with Suppliers and Partners, and selecting the latter in a fair and evidence-based way.

The purpose of this “Code of Conduct for Suppliers & Partners” (the “Code”) is to set out principles of ethical conduct which the Group expects its Suppliers/Partners to adopt in connection with the environment and society, as well as their corporate governance and sustainable development, but also to ensure in turn that they are adopted by their own suppliers and partners.

In the context of its process for selecting Suppliers and Partners, the Group views their acceptance of and adherence to this Code as a prerequisite. At the same time, it urges existing Suppliers/Partners to comply with the requirements of the Code, underlining that the extent of their compliance will be a key factor for continued collaboration.

## 1. Principles of Corporate Governance / Financial Sustainability

- The Group seeks to establish a fair business relationship with its Suppliers and Partners, in the framework of which all applicable legal and regulatory requirements are met, including compliance with Group policies.
- Suppliers and Partners of the Group should commit themselves to maintaining high standards of integrity in their business transactions. They should implement policies and procedures to prevent and combat fraud, corruption, bribery and money laundering.

## 2. Environmental protection

- In the course of their business activities, Suppliers/Partners of the Group are expected to use environmentally friendly methods while striving to minimize their environmental impact and continuously improve the environmental protection standards they have adopted.
- Suppliers/Partners of the Group should comply with the legislation, regulations and international standards on environmental protection.

## 3. Social responsibility

- Suppliers/Partners of the Group should guarantee the health and safety of their employees, ensure acceptable working conditions, take steps to prevent accidents in the workplace and occupational diseases, and in general adhere to the relevant legislative framework.
- Suppliers/Partners should offer fair remuneration and abide by the relevant labor legislation on minimum wages and maximum working hours.
- Suppliers/Partners should ensure a working environment free of psychological distress or harassment and verbal abuse. The treatment of their employees should be guided by respect for their personality, right to privacy and all individual rights without a punitive disposition or exploitation.

- Suppliers/Partners should adhere to principles of equal opportunities and be opposed to any discrimination against their employees on the basis of color, gender, sexual orientation, race, nationality, religion, social background, any kind of special needs, political beliefs, or age.
- Suppliers/Partners must undertake the commitment to not employ children or encourage child labor. They should strictly comply with minimum legal working age limits. If no such limit has been set in the countries where they operate, it should be considered to be at least 15 years of age.
- Suppliers/Partners of the Group must never employ someone against their will or exploit anyone, undertaking the commitment to ensure that there is no kind of forced labor within the sphere of their business activity.
- Suppliers/Partners should respect the rights of workers and in no way hinder their participation in labor/trade unions, while actively encouraging dialogue with employees' trade union bodies.

### Compliance with the Code

The Code forms an integral part of the main contract signed between the Group and its Suppliers/Partners. Each Supplier or Partner entering into a contractual relationship with the Group is required to declare their compliance with this Code and at the same time undertake the obligation to inform and ensure the compliance of their own Suppliers and Partners by signing this document, acknowledging that the Group shall be entitled to terminate the contract with them in the event that a Supplier or Partner, and/or a Supplier/Partner of the latter, violates the principles of the Code, particularly those relating to matters of integrity and ethics.