

SUPPLIER CODE OF CONDUCT

Introduction

At E.J. Papadopoulos S.A., we are committed to creating the right conditions for sustainable business growth and to ensuring ethical and responsible business conduct. Our suppliers play a crucial role in this commitment, as their business behavior and practices reflect on our reputation and the trust we have managed to earn from our customers and stakeholders.

The Supplier Code of Conduct of our company which applies in conjunction with the Corporate Code of Ethics, detailing the provisions of the latter with regard to our suppliers, sets forth the principles and standards that all our suppliers must adhere to when conducting business with our company, in compliance with applicable laws and regulations, particularly in the areas of human rights and labor practices, business integrity, environmental and social responsibility, product quality and safety, confidentiality, data protection and intellectual property, record keeping, compliance monitoring, and reporting violations.

By conducting business with our company, suppliers acknowledge and agree to comply with this Supplier Code of Conduct, the provisions of which supplement and constitute an integral part of any written or oral agreement(s) or contract(s) between the Supplier and E.J. Papadopoulos S.A. Suppliers are responsible for ensuring that their employees, agents, and subcontractors understand and adhere to the principles and standards outlined in this document.

Compliance with Laws and Regulations

Suppliers must comply with all applicable local, national, and international laws, regulations, and standards in the countries where they operate. This includes, but is not limited to, laws related to labor, health and safety, environmental protection, fair competition, and anti-corruption.

Human Rights and Labor Practices

i. Child Labor: Suppliers must not employ workers under the legal working age as defined by the laws and international standards applicable at the time. Suppliers should ensure that any young workers employed according to the applicable laws and regulations, do not perform work, which is likely to be mentally, physically, or socially harmful for them or jeopardizes their safety or has a negative impact on their education.

ii. Forced Labor: Suppliers must not engage in or support any form of forced, bonded, or involuntary labor. All work must be voluntary, and workers should have freedom of movement and the freedom to terminate their employment at any time after reasonable notice.

iii. Non-Discrimination: Suppliers are required to provide a work environment free from harassment, abuse and discrimination and treat all workers and employees with fairness, dignity and respect. All employment decisions (such as recruitment, wage and benefits policy,



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participation in training programs, promotion or termination), as well as the selection of their partners, should be based on objective evaluation criteria and should be offering equal opportunities, without regard to race, color, religion, gender, sexual orientation, national origin, age, disability, political affiliation or opinion, or any other characteristic protected by law.

iv. Freedom of Association and Collective Bargaining: Suppliers must respect the rights of workers to freely associate, join unions, and engage in collective bargaining. Suppliers should not interfere with workers' efforts to form or join unions or engage in collective bargaining.

v. Health and Safety

Suppliers are required to provide a workplace that is free from recognized hazards known or likely to cause injury or illness and must ensure healthy and sanitary working conditions. They must implement health and safety policies and procedures to prevent and respond effectively to workplace accidents and injuries and emergencies. Suppliers should ensure that all employees receive appropriate health and safety training and have access to necessary protective equipment at no cost to them. They must also comply with applicable laws and regulations regarding working hours for their employees and workers.

ivf. Wages and Benefits: Suppliers must provide wages, benefits and compensation that meet or exceed the legal minimum standards in the countries where they operate. Wages should be paid in a timely manner for all hours worked, and suppliers should ensure that workers receive clear and understandable information about their pay and benefits.

Ethical Business Practices

i. Integrity and Fair Dealing: Suppliers must conduct their business with integrity, honesty, transparency, impartiality, objectivity and ethically in every aspect. They shall avoid actual or perceived conflicts of interest and refrain from engaging in any form of corrupt practices, including bribery, extortion, embezzlement, smuggling, counterfeiting and related crimes (e.g., money laundering, insider trading etc.).

ii. Anti-Bribery and Corruption: The suppliers shall not offer, give, receive, or request gifts or benefits of any kind that could influence the professional judgment and decisions of the recipient in any business transaction. They must implement policies and procedures to prevent and address corruption in all its forms.

iii. Free and Fair Competition: Suppliers should engage in and promote free and fair competition, comply with antitrust laws and regulations, offer their products and/or services in fair prices, and not participate in any form of anti-competitive behavior, including price-fixing, market allocation, and bid rigging.

Environmental and Social Responsibility

E.J. PAPADOPOULOS S.A. BISCUIT & FOOD PRODUCTS MANUFACTURING COMPANY

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Suppliers must comply with all applicable environmental laws and regulations, as well as international environmental standards, and operate in an environmentally responsible and efficient manner, mitigating related operational risks and facilitating continual improvement. They should strive to minimize their environmental impact by adopting sustainable practices, by promoting the efficient use of resources and reducing waste and emissions to air, land, and water, by properly handling, storing, and disposing of hazardous and non-hazardous substances and materials and by preventing pollution. They should implement and maintain effective processes to identify, manage, and communicate physical, health and environmental hazards.

Suppliers should ensure responsible management and use of products and materials throughout their lifecycle.

Our company assesses every supplier's corporate process and policy related to environmental protection, in accordance with the above.

Suppliers are encouraged to support the communities in which they operate by engaging in activities that contribute to the economic, social, and environmental sustainability of those communities. In this context, we encourage our suppliers to participate, whenever possible, in our company's social initiatives, as well as to report their own corporate social responsibility actions and activities that occurred during each year of their collaboration with us (this primarily applies to companies with more than 50 employees).

Product Quality and Safety

Suppliers shall comply with the applicable industry standards, laws and regulations in relation to quality, product safety and good manufacturing practices. Suppliers must be capable of tracing the source of supply of their products and have a documented recall process.

Suppliers should achieve conformity of the products with the required specifications and ensure that they do not contain restricted or banned materials or substances.

Confidentiality, Data Protection and Intellectual Property

Suppliers must protect the confidentiality of all information entrusted to them by our company. They shall not disclose or use any confidential information for any purpose unrelated to the one for which it was provided and shall take all appropriate measures to prevent information leakage. They shall comply with all legal obligations regarding the lawful processing and protection of personal data. Suppliers are also required to respect intellectual and industrial property rights and to ensure that these are not violated.

Record keeping

Suppliers shall maintain financial, operational and business records in accordance with applicable legal requirements and generally accepted accounting practices.



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Monitoring Compliance

Suppliers must maintain documentation to demonstrate their compliance with this Code of Conduct. Our company reserves the right to verify compliance with these requirements using appropriate means. Suppliers are expected to cooperate fully with our company and provide all necessary information.

Reporting Violations

Suppliers are required to establish and maintain a procedure that allows their employees, suppliers, and customers to report any unlawful or unethical practices related to the workplace or management and personnel actions or omissions. Suppliers shall ensure that no disciplinary action or discrimination is taken against individuals who report such actions in good faith. Suppliers are required to report any actual or suspected material violations of this Code of Conduct to our company promptly. Reports can be made confidentially. Our company will investigate all reports and take appropriate corrective action as necessary.

Consequences of Non-Compliance

Failure to remedy a non-compliance in a timely manner after receiving a warning and/or certain egregious forms of non-compliance might constitute a just cause for termination of the business relationship with our company.

This Supplier Code of Conduct is effective as of 10/06/2025 and may be updated periodically. Suppliers will be notified of any changes and are expected to comply with the most current version.

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