

cosmos

EXPERTS IN ALUMINIUM™

Employee Code of Conduct

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Version 2026 #2

Basic Principles of COSMOS ALUMINIUM Code of Conduct

The Code of Conduct sets out the principles and rules governing Management's commitment towards employees and stakeholders.

The Code defines the expected conduct of employees and establishes the rules of acceptable behavior among employees as well as in their interactions with stakeholders.

The Code applies throughout the Company and addresses matters relating to:

- Human Rights;
- Occupational Health and Safety;
- Employees' Competencies, Skills and Obligations;
- Confidentiality and Non-Disclosure.

The Code has been developed with reference to the Company's business activities and the services provided in connection therewith, as well as the applicable legal and regulatory framework.

The Code applies to and is binding upon both current and future employees.

A. Human Rights

COSMOS ALUMINIUM recognizes human rights and is committed to safeguarding and protecting the rights of all individuals employed by the Company, whether under an employment relationship or a service agreement.

A primary objective is to ensure this commitment through preventive measures aimed at promptly identifying situations and behaviors that may violate human rights, both within the Company's internal environment and in the wider community.

It is important to emphasize that the Company has zero tolerance for cooperation with individuals who have been demonstrably involved in cases of human rights violations.

The Company's activities are aligned with the United Nations Guiding Principles on Business and Human Rights, the National Action Plan on Human Rights, and applicable Greek labor legislation.

- Any form of discrimination is prohibited regarding opportunities for recruitment, employment, remuneration, promotion, termination of employment, compensation, retirement, national origin, race, religion, gender, age, physical or mental ability, sexual orientation, or political beliefs.
- Every employee shall be treated with respect and dignity. Any form of abuse (physical or psychological) or bullying is expressly prohibited, as is any form of sexual or other harassment.
- Respect for diversity is mandatory, and any behavior that offends an individual's dignity or creates discrimination of any kind is rejected.

B. Health and Safety

Cosmos is committed to building a sustainable business that strives to achieve an optimal balance between the environmental, social and economic dimensions of its operations.

The health and safety of its employees constitute one of its core values. Providing a safe and healthy working environment is essential to the success of the business.

Cosmos seeks to implement its policy through systematic cooperation between Management and employees, by applying a health and safety management system that is fully aligned with ISO 45001:2018.

- Every member of Management and every Company employee shall comply with the policy and implement health and safety instructions and work procedures. In addition, employees shall promptly respond to and report unsafe conditions and opportunities for improvement.
- All employees shall always act in a manner that takes into consideration their own health and safety, as well as the health and safety of those around them.
- The Company complies with all applicable legislation and requirements relating to occupational health and safety.

C. Employees' Competencies, Skills and Obligations

Employees are required to comply with the Company's Internal Operating Regulations, as well as with the instructions and directives of Management, and to demonstrate their competencies and skills to achieve:

- Proper execution of the work assigned to them.
- Organization and planning of tasks to ensure their completion within predefined deadlines.
- Effective decision-making.
- Achievement of results.
- Promotion of a spirit of cooperation and teamwork through communication and collaboration.
- Demonstration of appropriate ethical, professional and conduct-related behavior towards colleagues and stakeholders, based on the Company's values.

D. Confidentiality and Non-Disclosure

Every employee of the Company, both in the performance of their duties and in their dealings with third parties, is required to safeguard the confidentiality and secrecy of information.

The Employee undertakes, both during their employment with COSMOS and after the expiry or termination of their employment agreement with COSMOS, not to disclose in any manner whatsoever, whether by word, action or omission, nor to cause or facilitate the disclosure to or by any third party, of any information of any type or form relating to facts and information concerning COSMOS's business, organization, structure, operations, activities, products, production processes, relationships with customers, business, administrative and financial methods and practices relating to research, production and development, future intentions and business plans, trade secrets, accounts, financial policy and financial information, and generally the course and development of the business, including COSMOS's price lists, costing information, etc., as well as lists, information or data relating to suppliers, partners or customers, and the policies, affairs and transactions of COSMOS and/or any affiliated or subsidiary companies.

This obligation applies to any such information that comes to the Employee's knowledge in their capacity as an employee of COSMOS and/or that otherwise comes to their attention during their employment relationship with COSMOS.

All such information, whether written or oral, is expressly acknowledged and agreed to constitute professional and confidential business information of COSMOS.

Effectiveness of the Code of Conduct

Compliance with the Code is the responsibility of all employees and business partners of the Company.

Cosmos Aluminium reserves the right to review and update the Code whenever deemed necessary.

Responsibility for ensuring compliance with the Code lies with the Human Resources Department.

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Contact Details

The Company is committed to fostering a business culture of transparency and accountability. Accordingly, it requires the highest possible standards of professional and ethical conduct from all employees and business partners.

The Company also ensures that everyone can express their views by submitting reports and complaints concerning matters such as harassment, discrimination and hazardous situations, with the aim of ensuring their prompt resolution.

In order to strengthen the prevention and deterrence of misconduct, unethical behavior and violations, any person who has concerns or suspicions regarding the above matters in relation to the Company's operations is encouraged to report them, with the option of remaining anonymous, without fear of retaliation by the Company.

In this context, the Company has established cooperation with an independent external whistleblowing/reporting system to facilitate and make the reporting of complaints easier and safer.

https://cosmosaluminium.whistlefreen.app/whistle

Alternatively, employees may submit an oral or written complaint to the following Reporting Persons:

COSMOS Reporting Person:

Eleni Marinou

T: 2410 567554

email: emarinou@cosmosaluminium.gr

ETEM Reporting Person:

Styliani Keoglou

T: 210 4898520

email: skeoglou@etem.com

The Chairman of the Board



Xenofon I. Kantonias

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Cosmos Aluminium A.E.

8th km National Road Larissa-Athens

41110 Larissa

T: 2410 567579