

CODE OF CONDUCT

GOVERNING THE PROCUREMENT OF GOODS AND SERVICES

Recognising its responsibility to society, Goody's | Everest Group is committed to incorporating the 10 principles of the UN Global Compact on human rights, labour conditions, environmental protection and anti-corruption into its culture and business practices, and to making a practical contribution to the achievement of the 17 Sustainable Development Goals (SDGs) of the United Nations.

In this context, we recognise the importance of ethical and sustainable procurement practices in achieving the Group's business objectives and sustainability goals. We are committed to the use of sustainable practices which we consider an integral part of the way we operate and believe we can play an active role in improving the social, economic and environmental practices followed throughout our supply chain, for the benefit of society. In addition, we believe that responsible procurement practices ensure proper management of the risk arising from the relationship with our partners and suppliers.

Always operating within the framework of the national and European legislation and with the aim of ensuring proper professional conduct, ethical and legal standards, we consider it necessary that the following principles and standards are observed as minimum requirements to be met by our suppliers when procuring goods and services.

The basic principles governing the Code of Conduct for Procurement are derived from Vivartia's Code of Conduct and the Goody's | Everest Group's Code of Business Ethics applicable to our employees, Administration, shareholders, and partners.

This Code is communicated to each existing or prospective supplier who shall declare by signing that they understand its contents and agree to comply with the principles and standards contained therein.

This Code applies to all companies of the Goody's | Everest Group.

Note: Goody's | Everest Group means "Goody's Single-Member SA" and its subsidiaries (hereinafter: the Group).

Buyer - Supplier Relationships

- Our relationships with our suppliers are based on **price, quality, service, financial reliability, integrity** and **market position**. The selected suppliers offer the Group

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the best possible price-quality ratio, and delivery and payment terms. Suppliers shall ensure and guarantee the safety and quality of their foodstuffs, in compliance with European and national legislation.

- All parties involved in the Group's Procurement Department shall foster and maintain a **relationship of trust** with our suppliers and a **climate of professional cooperation** that encourages suppliers to provide the best possible service to the Group.
- In addition to maintaining good relationships with already selected suppliers, new and improved **sources of supply** and approaches to secure volumes and competitive prices **should be continually sought and explored**.
- Without exception, employees who are involved in the Group's Purchasing activities **shall not have any relationship of interest with suppliers**.
- Employees working with suppliers **must remain objective and impartial**. In particular, employees shall not accept or solicit from a supplier any personal benefit that may affect their objective evaluation.
- All suppliers shall be treated **equally** in terms of their ability to present their products and services to the Group, and shall be offered fair and equal opportunities. More specifically:
 - Competition between existing and potential suppliers shall be kept free.
 - The technical specifications of a product or service shall be precisely tailored to the requirement and presented in a clear and detailed manner.
 - The requests for tender that are sent to prospect suppliers shall be identical; all suppliers shall be offered the same amount of time to prepare their tenders, and any additional information or clarifications shall be given to all prospect suppliers at the same time.
 - If an extension of the deadline for submission of a tender is granted to one supplier, the same extension shall apply to all suppliers.
- **Ethical issues** arising in the context of cooperation may lead to the exclusion of the suppliers concerned, depending on their gravity according to good morals and customs.
- In the case of a **single supplier**, the reasons shall be stated why the supplier is considered to be unique (*e.g. full response to the technical specifications set by the Company, innovative product, speed of response, use of proven know-how/new technology, etc.*).
- For **essential commodities** that are procured in large volumes in order to cover regular and recurring needs of the Group Companies, it is **necessary** to ensure alternative suppliers of these items, in order to maintain continuity of supplies in case of an emergency and to limit the risk of dependence on a single supplier.
- Suppliers are encouraged to implement appropriate business continuity plans for functions that support the business of the Goody's | Everest Group.

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Bribery / Corruption / Influence peddling

- For the implementation of the current anti-corruption and anti-bribery policy (see our anti-bribery policy at <https://goodyseverest.com/el/compliance>), our company maintains an Anti-Bribery Management System that was created according to the requirements of the International Standard ISO 37001:2016. This policy defines the objectives of our fight against corruption and bribery, and encourages the development of trust without fear.
- We conduct our business legally, ethically and with integrity. Corrupt practices are unacceptable and we take a zero-tolerance approach to bribery, corruption and influence peddling. We are committed to conducting our business with professionalism, fairness, integrity and respect in all our business transactions and relationships wherever we operate, and to implementing and enforcing effective anti-bribery systems. We comply with the legal and regulatory framework in each country in which we operate.
- We expect those doing business with us to adopt a similar zero-tolerance approach to bribery, corruption, fraud, unfair competition and breaches of personal data. In addition, the Group's Suppliers/Associates must comply with all applicable laws on intellectual property rights.
- The Administration and senior executives at all levels are responsible for implementing the above Policy in all workplaces of the Group and ensuring that their subordinates are aware of and understand this Policy.
- In addition, **no employee** who manages procurement **is allowed to engage in corruption** or bribery of any kind, either directly or indirectly.
- In any case, the procurement of gifts to third parties of any kind is subject to obtaining the **appropriate approvals**, based on the applicable corporate procedures.
- We expect from those doing business with us to take all necessary measures and prevent any form of money laundering.

Confidentiality / Data Protection / Information Security

- In addition to its legal and contractual obligations, the Group's ethical principles require **confidentiality of sensitive information** relating to the Company and its suppliers.
- Confidential information may be data, files, documents, in paper or electronic form, but also any material relating to the organisation and operation of the companies (know-how, methodologies, business planning, financial transactions, research and development, procedures, contracts, legal documents, organisation, etc.).

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- The staff of the companies shall act in an ethical and confidential manner in this respect and shall ensure the protection of the information they manage. Each employee who handles confidential information shall use such information on the basis of authorisations, and shall avoid handling or disclosing internal information to third parties, either for his or her own financial benefit or for any other purpose.
- Special treatment is reserved for the personal data of the staff and those who deal with the companies in accordance with the provisions of the European Regulation on the Protection of Personal Data and the relevant national legislation. Appropriate organisational and technological measures are implemented to ensure the confidentiality, availability and integrity of the personal data of employees, customers and partners. In addition to its legal and contractual obligations, the Group's ethical principles require confidentiality of all types of information relating to its employees and partners.
- Information Security: The availability and integrity of the Group's IT systems is of utmost importance. Personal and professional data shall be protected against unauthorised access, loss, or manipulation using any technically available means, in accordance with applicable national law. The Goody's | Everest Group adheres to practices and follows procedures and policies regarding data protection and IT security. In particular, the Group's production units have obtained ISO:27001 information security certification.
- Confidentiality shall bind employees even after their potential departure from the Group.

Conflict of Interest / Transparency and Integrity / Competition

- The Goody's | Everest Group adopts a transparency regime throughout its activities, with appropriate policies and procedures in place to prevent any form of irregular or illegal transaction. The execution of procurements on behalf of the Group is carried out by authorised officers representing the interests of the Goody's | Everest Group only. Our relationships with suppliers are also governed by a regime of transparency, respect, honesty, and integrity, and all suppliers are treated equally and impartially.
- This policy is also reflected in the provision of the necessary information to any competent public authority, the production of financial reports that provide a true and fair view of the financial situation of the Group companies, and the reliable and fair information of shareholders and any relevant stakeholder.

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- The Goody's | Everest Group has invested in enhancing transparency, in the integrity of financial reporting as a means of providing reliable information to its Administration, and in the correct and accurate disclosure of its financial information in accordance with internationally accepted accounting standards and principles, so that the accounting records provide a fair presentation of the nature of transactions.
- All officers or representatives of the Group authorised for procurements who feel that they are in the midst of a perceived or anticipated conflict of interests shall inform their supervisor and the Company's CEO, who will then assess the situation and take necessary actions.
- All business decisions must be taken without bias and with the sole consideration of the Group's interests. In this light, all employees shall avoid activities that may put their professional loyalty to the Group at risk due to a conflict of professional interests and personal benefits. Employees should consider whether they have a personal interest (such as a financial interest in another business) that could affect their impartiality in making decisions concerning the business.
- The Goody's | Everest Group promotes healthy and fair competition and does not engage in unfair understandings and agreements or in acts that are contrary to good business ethics and the law.
- More specifically, the Group does not engage in unfair price-fixing, prearranged customer acquisition and market allocation practices. It follows the rules of healthy competition and avoids promoting its products through unfair or misleading advertising, fully respecting the relevant provisions of national and Community legislation. It cultivates a high level of professional conduct in all dealings and relationships, both with partners and colleagues.

Environmental Criteria

In addition to complying with environmental laws and regulations, the Goody's | Everest Group is committed to reducing its environmental impact and promoting the sustainability of the natural resources that depend on its operations.

In this direction, it expects its Suppliers/Partners to play an important role in achieving these objectives, both through the implementation of environmentally responsible practices and through the submission of alternatives and proposals, to act with the protection of the natural environment in mind, aiming to minimize the negative environmental impact that their activities may cause. In addition, they should ensure that they obtain, update and maintain records of all necessary national and local environmental permits and requirements governing the business activities they undertake on behalf of the Group.

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- Suppliers and partners of the Goody's | Everest Group's should systematically ensure that they improve the efficient use of natural resources and adopt good management practices with regard to natural resources (e.g. water, energy sources, raw materials). They shall evaluate the use of technological measures for energy upgrading and procure raw materials from areas where they are managed in a sustainable and responsible way.

Any negative impacts on the environment and climate should be minimised or eliminated at the source. This can be achieved by modifying production processes, by performing maintenance and/or replacement of production machinery, by implementing practices to reduce or substitute consumption, and by reusing and recycling materials.

- The suppliers/partners of the Goody's | Everest Group shall systematically take care to prevent and avoid any form of environmental impact associated with their activity, and be able to deal effectively with incidents, if and when they occur, bearing the cost of repairing the damage. With regard to the management stage, they should be able to choose the appropriate method of disposal in order to minimise waste by focusing on the methods of reuse, recovery and recycling of such waste.

Social Criteria / Health & Safety at Work

The Group's priority is the health and safety of its employees in all areas of its business activity. In this context, it expects its suppliers/partners to share this commitment by creating a decent working environment, free of health and safety risks, and by complying with national and European legislation.

- The Group's suppliers/partners shall guarantee the health and safety of their employees in all aspects of labour in the field in which they operate, and comply with all necessary standards regarding health and safety in the workplace. They shall also be able to establish means and measures of protection relating to the prevention, information and training of employees, aiming: a) to avoid risks and to control and manage risks that cannot be avoided; b) to provide appropriate instructions to employees, favouring group protection measures; c) to adapt working conditions, equipment and methods, taking into account technical developments. They must comply with the legislation in force, and promote means and measures of individual and collective protection to eliminate occupational hazards. The safety equipment and measures shall be adapted when changes occur in working conditions.
- The suppliers/partners of the Group shall have and implement procedures and systems for the proper recording, classification, management and investigation of occupational accidents and illnesses in their workplaces, which will allow them to avoid recurrence. They shall also undertake to provide their employees with the

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necessary medical treatment in the event of an accident and to facilitate their return to work. Finally, they shall oppose any form of disciplinary action against their employees for expressing concerns about safety and health conditions in the workplace.

Human Rights / Labour Law

- The Group's suppliers/partners shall be able to demonstrate that working hours comply with the applicable national legislation or the standards of the industry in which they operate, and that they are committed both to paying a daily wage or salary to all their employees equal to or exceeding the thresholds provided by law and to providing all the allowances stipulated by law (for leave, vacation time, etc.). They shall also be able to prove that their employees are compensated for overtime at the rates set by applicable laws and regulations, and declare that they do not use salary reduction practices as a disciplinary measure. Finally, they shall be able to prove that they pay their employees' outstanding wages, insurance contributions and any severance pay on time, and to clearly document the arrangements under which these payments are made.
- The Group's suppliers/partners shall ensure that they are committed to continuous improvement, seamless provision and uninterrupted maintenance of a good working environment.
- Human resources shall be treated with respect and dignity, in accordance with national legislation and the principles of the International Labour Organisation, the fundamental right to freedom of association; any form of cruel or inhuman treatment, including sexual harassment, corporal punishment, psychological blackmail, coercion, verbal abuse and any kind of unreasonable restriction on the entry or exit of any employee from the premises of the company is unacceptable.
- The Group's Suppliers/Contractors shall implement practices that promote integrity and ensure a work environment free of all forms of discrimination; they are required to offer equal opportunities for training and advancement to all employees, regardless of gender, age, origin, spiritual, religious and ideological beliefs, sexual preference and other personal characteristics.
- Suppliers / Contractors of the GOODY'S | Everest Group are expected to demonstrate zero tolerance to human rights violations, incidents of forced or compulsory child labour, and any form of violence in the workplace. They should ensure the prevention and elimination of any condition that may encourage these phenomena in their workplaces in the areas where they operate.

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Compliance with the Code / Reporting

This Code is drafted and reviewed (annually or on an ad hoc basis, as required) and has the approval of the Administration. The Code (and any revision thereof) shall be regularly communicated and adhered to by all suppliers and staff involved in the procurement of products and services.

- All suppliers and partners of the Goody's | Everest Group are responsible for complying with this Code, acknowledging their obligations. The Goody's | Everest Group reserves the right to systematically monitor and objectively evaluate suppliers against their contractual and ethical obligations as stated in the Code.
- For the purposes of monitoring compliance with the Code, suppliers and partners of the Goody's | Everest Group shall be cooperative when requested to complete a questionnaire or to provide relevant documentation.
- If the Group becomes aware of a breach of the Code, it reserves the right to terminate its relationship with any supplier or partner who does not comply with the Code.
- In the event that Suppliers and Partners of the Group become aware of or suspect issues of violation and/or compliance with the content of this Code, they may submit reports at estiasisethics@vivartiafs.com.

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ACCEPTANCE BY SUPPLIER/CONTRACTOR

I, the undersigned, declare on behalf of the company
that I have read and understood the policies and principles outlined in this Code of
Conduct for Suppliers.

Company:

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Full name and title of signatory:

.....

Signature and stamp

Date:

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