

## Responsible Business Operation Policy

**A. HATZOPOULOS S.A. was established in 1931 and became a Public Limited Company in 1975. Today, the company owns two state-of-the-art production facilities in Thessaloniki and operates on an international level through a well-organized sales network.**

The mission of the company is to offer safe, functional, innovative and competitive packaging solutions. The products of A. Hatzopoulos S.A. are principally used in food packaging (coffees, beverages, snacks, confectionery, dry nuts, dairy products, processed meat products, ready meals, etc.). At the same time, the Company also produces packaging materials for detergents, cosmetics, pharmaceutical products, chemicals, tobacco, labels and much more. The company has steady organic growth, which is based on its continuous investments in new equipment, modern facilities and infrastructure and human capital.

The Company abides by the following principles:

- **Meritocracy**
- **Knowledge**
- **Compassion**
- **Quality**
- **Ethos**

The vision of the company is to set an example of proper and best practices with respect to:

- Quality across all sectors
- Reliability
- Know-how and expertise
- Working environment
- Active contribution to society

### PURPOSE

This policy constitutes the reference framework for the sustainable development of the company and is applied to employees, management, partners and suppliers and is aligned with the principles of the UN Global Compact and the United Nations Sustainable Development Goals (SDGs).

The objective of the policy is to create long-term value for all stakeholders, to comply with legislation and to continuously improve environmental, social and corporate performance.

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## COMMITMENT

Company A. HATZOPOULOS S.A. is committed to operating responsibly, transparently and with integrity, integrating Environmental, Social and Governance (ESG) principles into all its activities.

Consequently, the company is committed to:

- ✓ Continuously improve its sustainability performance and strategy.
- ✓ Conduct itself in an ethical manner and contribute towards the economic development and, at the same time, the improvement of both the quality of life of its employees, as well as of the local community and society as a whole.
- ✓ Protect and safeguard personal data.
- ✓ Develop management systems regarding:
  - ✓ the quality of its products & services;
  - ✓ food safety;
  - ✓ hygiene & safety at the workplace;
  - ✓ environment / climate change / air pollution
  - ✓ the safety of information and personal data;
  - ✓ anti-corruption
  - ✓ information security
  - ✓ energy
  - ✓ governance
- ✓ Setting specific measurable objectives, the progress of which is monitored and reviewed, with the aim of continuously improving the company's culture and performance in relation to the above, with their regular review as the main tool.
- ✓ The company monitors and evaluates the sustainability indicators on an annual basis and, where appropriate, discloses the results to interested parties
- ✓ Compliance with all national and international provisions of the legislation that concern it.
- ✓ Focusing on the prevention of small or large-scale accidents that may affect
  - ✓ employees
  - ✓ associates
  - ✓ consumers
  - ✓ society
  - ✓ environment & climate change
- ✓ The maximum satisfaction of its customers, by producing and offering safe and quality products and services, pursuant to the products' and to the consumers' requirements.
- ✓ Take account of social requirements-mandates.
- ✓ Encourage its personnel and immediate associates to manage every natural resource with care and showing due diligence.



- ✓ Ensure the availability of the appropriate resources and conditions for the attainment of the above, based on the systematic analysis of all of its activities for the ascertainment, assessment, evaluation and uninterrupted control.
- ✓ Continuous training and development of its personnel.
- ✓ Regularly updating its Values and Policy to all stakeholders (both in its internal and external environment), in Greek and English, or any other language deemed necessary and through the best communication channels.

## STAKEHOLDERS

The company recognizes employees, customers, suppliers, shareholders, local communities, public authorities and other partners as key stakeholders. We are committed to maintaining open channels of communication, taking into account their reasonable expectations and integrating their relevant needs and concerns into business planning and decision-making.

Systematic collaboration with stakeholders contributes to creating long-term value, managing risks and achieving the company's sustainability goals.

## ENVIRONMENT – CLIMATE CHANGE

The company's objective is to reduce its environmental impact.

- Together with our partners, we focus on reducing the impact of all our activities on the environment and on reducing our carbon footprint.
- We continuously evaluate the production process, as well as the disposal and use of both incoming and outgoing materials and services.
- We strive to reduce the adverse environmental impacts of people moving to and from our facilities.
- We ensure the implementation of the best available industrial techniques and the taking of all necessary measures to avoid any kind of local and accidental pollution.
- We seek to adopt sustainable practices in the company's activities and facilities, e.g. optimal water management and conservation, use of renewable energy sources, recycling.
- We support the principles of the circular economy by designing packaging with a reduced environmental footprint, promoting recyclability and optimizing resource utilization.
- We set and monitor energy performance indicators (EnPIs) and energy baselines.
- We encourage the procurement of energy-efficient products and services.
- We monitor, measure and analyse energy efficiency.

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- We train and raise awareness among staff about the importance of energy management.
- We systematically focus, in collaboration with our partners, on improving energy efficiency and reducing energy consumption across the entire spectrum of our activities.
- We conduct a continuous energy review of our processes, evaluating energy consumption, equipment and operations, with the aim of identifying opportunities for improvement.
- We set measurable energy targets and performance indicators and systematically monitor their achievement through appropriate energy baselines.
- We systematically measure and monitor the carbon footprint of our activities and implement actions to gradually reduce greenhouse gas emissions across our entire range of operations (GHG Scopes 1,2 &3) and reduce non-GHG air and atmospheric pollutants.
- We take into account the risks and opportunities associated with climate change in business planning and strategic decision-making.
- We integrate environmental sustainability criteria into the investment and development processes of new projects and technologies.

## OCCUPATIONAL HEALTH & SAFETY

A. Hatzopoulos S.A. recognizes that Occupational Health and Safety is a fundamental priority and an integral part of its responsible business operations. The company is committed to providing safe and healthy working conditions, with the aim of preventing occupational accidents and occupational diseases, as well as protecting all employees, partners and other stakeholders affected by its activities.

Our approach is aligned with applicable legislation, the principles of the ETI Base Code and internationally recognized Health and Safety standards.

In this context, A. Hatzopoulos S.A.:

- ensures compliance with applicable Occupational Health and Safety legislation and other relevant obligations,
- identifies, evaluates and systematically manages occupational risks, taking prevention and control measures,
- ensures that workplaces, equipment and procedures are safe and properly maintained,
- provides appropriate information, training and supervision so that employees can perform their work safely,
- promotes the active participation and consultation of employees on Health and Safety issues,
- implements prevention, preparedness and response procedures in emergency situations,
- extends Health and Safety requirements to contractors, associates and visitors who are in its facilities or acting on its behalf,

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- seeks to continuously improve performance in the field of Health and Safety, reinforcing a culture of prevention and responsibility at all levels of the organization.

## FOOD SAFETY

A. Hatzopoulos S.A. designs and produces packaging material structures using industrial standards for Quality and Hygiene in order to meet its customers' needs across the entire life cycle of the products (packaging, transportation, storage, disposal-recycling).

The principal objectives at the design and development stage of the structure, but also at the processing-production of flexible packaging materials with respect to food safety for industrial packaging materials are:

- To hinder the migration of harmful chemicals from them to the foods to be packaged, which may affect the organoleptic features or the quality of the foodstuffs and which may, consequently, also harm consumers' health.
- To avoid the contamination of the packaging, which may alter the foodstuffs, affecting consumers' health, or which may directly affect the user of the packaging.

The aforementioned pursuits are in agreement with the attested contemporary European regulations and directives on materials and objects intended to come in contact with foodstuffs, as well as with the requirements on food safety that ensue from CODEX ALIMENTARIUS.

## SOCIETY

A. Hatzopoulos S.A. operates anthropocentrically, i.e. focusing on the human factor, by:

- Respecting our employees as individuals.
- Showing the utmost respect towards our client-individual, who is also the end user/recipient, either directly or indirectly, thus being able to offer to the greater community.
- Taking steps towards understanding the most effective to fulfil local society's needs so as to implement commensurate initiatives.
- Understanding and being aware of our impact on local and greater society, so as to maintain a harmonious relation of bidirectional communication.
- Being active members of international bodies promoting corporate responsibility, while adopting internationally established indexes and CSR standards.
- Supporting local and international organizations engaged in social work.

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## HUMAN RIGHTS

- Our aim and objective is to support and respect the protection of internationally declared human rights, such as the freedom of association and collective bargaining, the prohibition of forced and child labor, as well as of human trafficking.
- We develop and engage in collaborations exclusively with businesses implementing, applying and practising the international standards for respecting and protecting human rights.
- We focus on meritocracy – egalitarianism – diversity – harmony.
- We guarantee the eradication of any and all discrimination and promote equality across the wider chain of our collaborations.
- We ensure the protection of the personal information of every individual with whom we communicate and collaborate with the utmost confidentiality and respect of each and every contracting party.
- We implement a policy against child and/or forced labour.
- We encourage the active participation of employees through two-way communication and consultation mechanisms, ensuring the free expression of opinions, suggestions and concerns without fear of retaliation or adverse treatment.

## GOVERNANCE & BUSINESS CONDUCT STANDARDS

- We recognize that sustainability encompasses all areas of sustainable development and the way we impact people through our business processes.
- We encourage dialogue with the local community, take into account its needs and undertake initiatives to support it for mutual benefit.
- We operate in a way that safeguards us from unfair business practices.
- We believe that a responsible approach to developing relationships between businesses and the communities we serve, global or local, is an important factor in promoting business success.
- All commercial and business relationships are governed by integrity, fair competition, honesty and mutual respect.
- Partnerships are evaluated using environmental, social and ethical criteria.
- All groups and people with whom we develop professional relationships are treated fairly and with due respect.
- We ensure the confidentiality, integrity and availability of our information.
- We systematically identify and manage information security risks.
- We implement appropriate technical and organizational measures to protect data and systems.
- We train our staff on information security issues.
- We take measures for the appropriate management of information concerning transparency and/or conflicts of interest issues.
- Competition is conducted on fair terms and based on the quality, value and innovation of the products and services provided.

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- We encourage our associates to evaluate us regarding our performance and all responses are analysed, so that corrective and preventive actions are taken where necessary
- We implement a system for recording and monitoring reports for potential complaints of any kind and encourage the reporting of any incident that violates our code of conduct (e.g. fraud, bribery, etc.).
- We implement a regular review of our policies and business activities with the aim of rational decision-making and the creation of long-term cooperative and trusting relationships with businesses at every stage of the value chain.
- We define, monitor and review indicators related to goals and objectives:
  - ✓ Sustainability
  - ✓ Product & Service Quality
  - ✓ Food Safety
  - ✓ Occupational Health & Safety
  - ✓ Environmental Protection / Climate Change / Air Pollution
  - ✓ Information and Personal Data Security
  - ✓ Corporate Social Responsibility
  - ✓ Anti-Bribery
  - ✓ Energy Management and monitor their progress through internal audits
- Our current policy runs through the entire chain of the company's activities and is reviewed regularly to ensure its updating.
- The company's policy is communicated to its staff, partners and interested social groups, as an encouragement to embrace the broader social values that we advocate.

## PREVENTION AND FIGHTING CORRUPTION

A. Hatzopoulos S.A. is committed to operating with integrity, transparency and high standards of business ethics. In this context, it implements a strict zero-tolerance policy against bribery and corruption, aiming to prevent, identify and address relevant incidents in all its activities.

- The Company strictly prohibits any form of bribery and corruption, whether direct or indirect, regardless of value, form or circumstance.
- The independence, impartiality and adequacy of the Complaints and Reports Officer for bribery and corruption issues is ensured.
- The Company encourages staff, partners, suppliers and any interested party to report, in good faith, any suspicion or incident of bribery or corruption.
- All reports are treated confidentially, discreetly and objectively.
- Persons submitting reports are protected from any form of retaliation, intimidation or adverse treatment.
- This policy applies to all levels of the Company, as well as to any third party acting on its behalf.

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- Violation of this policy entails the imposition of disciplinary and/or contractual sanctions, in accordance with applicable law and the Company's internal procedures.

## ASSOCIATES

We acknowledge that our associates have a significant effect on the attainment of the objectives that relate to our products and services.

- The company encourages the adoption of the principles of this policy by its partners and suppliers and establishes a Code of Conduct for common acceptance.
- The implementation of a responsible sustainability policy is taken into account and evaluated for each collaboration with suppliers. We inform the main suppliers of the results of the evaluation.
- We seek to record our mutual obligations, as we seek sustainable collaborations and mutual benefits.
- We prioritize cooperation with suppliers that implement responsible natural resource management practices, including water conservation, pollution prevention.
- We encourage our suppliers and customers to reduce waste production and maximize the reuse and recycling of materials in the context of their activities.
- We seek regular contacts with our suppliers - partners, in order to support the above actions.

We work with our associates to:

- Promote safe and environmentally friendly products for consumers, with a reduced environmental footprint and increased recyclability.
- Reduce the environmental impact of the packaging and transportation of our raw materials and products as much as possible.
- Implement action plans for the return, recovery, reuse and recycling of products that are at the end of their life cycle.
- Encourage our partners to measure, monitor and reduce greenhouse gas (GHG) emissions related to their activities, promoting the use of renewable energy sources and improving energy efficiency.
- Contribute jointly to improving sustainability performance and indicators.

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## RESPONSIBILITIES

The Board of Directors is responsible for overseeing and implementing this policy. All executives and employees must operate in accordance with the principles and commitments described herein.

Progress towards sustainability goals is monitored on a regular basis and reviewed by Management.

Thessaloniki, 01.06.2026



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