

ERMILIA OLIVES A.E.

POLICY – PL 03		ETHICAL TRADING POLICY FOR SUPPLIERS			
Έκδοση :	ΥΠΔ	Αρ. Έκδοσης:	1η	Ημ/νια Έκδοσης:	03/02/2023
Έγκριση:	Διευθύνων Σύμβουλος	Αναθεώρηση		Ημ/νια Αναθεώρησης:	

ETHICAL TRADING POLICY FOR SUPPLIERS

Our company has recognized that the quality of the food is closely linked with the quality of our environment and our well-being and has defined its requirements for all aspects of sustainable development.

As part of our sourcing policy, we have put in place responsible sourcing guidelines which principles will help us with the selection of our suppliers.

The principles are as follows:

1. Make every effort to ensure 100% traceability and improve transparency
2. Select suppliers who have set up a management system and meet the criteria of high standards of quality and food safety (HACCP, FSSC 22000, GFSI etc).
3. Prioritize environmentally and socially certified raw materials, when these certifications exist and when they meet our challenge, needs and requirements.
4. Set up a surveillance program to cover ethical, human rights and environmental aspects, on all our raw materials, through assessments.

By adhering to this Supplier Policy, our suppliers are committed to meet the stated expectations and accepting any verification that will be carried out or required by our company. We are committed to work with our suppliers in engaging in a continuous improvement process on the issue of ethics and business ethics. The suppliers in their turn must work with their own subcontractors and suppliers and guarantee adoption and implementation of this Supplier Policy by their subcontractors and suppliers and the obligation in force in the country of origin but also that of the exporting country.

The “Code of ethics and good business conduct” clearly defines the rules of ethics and is applicable to both permanent and seasonal employees. A whistle blower alert procedure is also in place on these matters. Suppliers, as a stakeholder, can also alert our company

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when serious behavior prohibited by law or by this “Code of ethics and good business conduct” is observed.

We at Ermilia Olives, recognize that there are various social and environmental impacts associated with the production of our raw materials and we are fully committed to sourcing all our raw materials in the most responsible way.

Compliance with regulations

All suppliers must have systems in place to manage critical legal aspects to ensure that they comply with the requirements of all local, national and international law and codes of practice.

Requirements in terms of ethics and business conduct

We are committed to acting with integrity and transparency in all our business dealings and to put effective systems and controls in place to safeguard against any forms of bribery, corruption and modern slavery in our business and supply chains.

Corruption: A policy about corruption, either active or passive, is applied. We expect our Suppliers to comply with all applicable laws relating to fight against corruption and that they take appropriate measures to prevent, detect and sanction any fact relating, directly or indirectly, to corruption or influence peddling in the course of their activities. This includes extortion, money laundering, fraud and bribery.

Gifts and Hospitality: Gifts and hospitality may be accepted if expresses as courtesy in the context of established business relationship and if their scope and value are limited and offered openly and transparently. In no case should they be offered with the expectation of counterpart (political contribution, charitable or associative).

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Prevention of conflicts of interest: Our suppliers must comply with all applicable legislation on conflicts of interest and strive to prevent the occurrence of situations creating a conflict of interest in the context of our collaboration.

Respect for competition: Our supplies are expected to take preventative measures to avoid any anticompetitive practice or behavior. This covers the prohibition of abuse of a dominant position, concerted practices and unlawful agreements between competitors.

Privacy and Intellectual Property Rights: The suppliers respect the confidentiality of information received owned by Ermilia Olives and will never use this information for their own benefit. The information transmitted must be exact and fair and must not mislead. The providers take steps to ensure respects for the rights of ownership intellectual.

Personal data protection: The suppliers comply with the applicable laws and regulations regarding the protection of personal data.

Transparency of information: The provide agree to work in transparent and accountable as part of their business.

Respect of social and human rights standards

We are conscious of the responsibility we share with our suppliers and customer for the welfare and safety of workers who produce the good we buy, manufacture and sell. We are committed to ensure that all workers involved in our supply chain are treated fairly and that all our products are sourced and produced under a set of socially equitable criteria.

This involves promoting and respecting the International Labor Organization (ILO) declaration on fundamental principles and right at work as well as international human rights law. The supplier ensure that the principles set out below are enforced on their sites and those of their suppliers. They cannot in any case be complicit in human rights abuse.

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In accordance with the International Labor Organization (ILO) Conventions, the United Nations Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child and the Elimination of All Forms of Discrimination against Women, the Global Compact of the United Nations and the OECD Guidelines for Multinational Enterprises aims to comply with specific social and environmental standards. Companies must ensure that the code of conduct is also enforced by their suppliers who are involved in the final stages of product production. The following requirements are very important and are applied by ERMILIA OLIVES S.A.

The following applies to the framework:

1. Legal compliance

Implementation of all national laws, industry practice standards and ILO and UN treaties.

2. Free participation in unions and the right to collective bargaining

All staff have the right to form or join any association they wish and collective bargaining is respected. Employee representatives can have contacts with employees in the workplace. All of the above meet the requirements of ILO conditions 87, 98, 135 and 154.

3. Non-discrimination

Everyone will have the same rights to recruitment, education, promotion, remuneration and retirement regardless of gender, age, religion, race, social background, physical disability, body parts, nationality, sexual orientation or any other personal characteristic. All of the above meet the conditions of ILO conditions 100, 111, 143, 158 and 159.

4. Remuneration

Staff remuneration for working hours and overtime must comply with or exceed the legal threshold. Under no circumstances are unauthorized or disciplinary reductions in salaries

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made. The payroll of the staff is defined in detail and at predetermined regular intervals.

All of the above meet the requirements of ILO 26 and 131.

5. Working hours

Staff working hours are in accordance with national law. The maximum permissible employment should in no case exceed 48 hours per week on a permanent basis and 12 hours per week in the form of overtime. Overtime is done voluntarily by the staff and is remunerated with additional remuneration. All staff have at least 1 day off per week. All of the above meet the requirements of ILO Conditions 1 and 14.

6. Hygiene and safety in the workplace

A set of procedures has been put in place to ensure health and safety in the workplace. Procedures include the use of personal protective equipment, the use of machinery and mechanical equipment bearing appropriate safety measures, the marking of hazardous areas on the company's premises, the cleanliness of locker rooms, toilets and staff dining areas, the provision of refrigerators for food storage as well as easy access of staff to drinking water. Practices and working conditions that violate human rights are prohibited. All of the above meet the conditions of ILO 155 and proposals 164 and 190. An administration representative has been appointed responsible for staff health and safety and in charge of implementing the BSCI health and safety parameters. All staff are trained at regular intervals in matters of hygiene and safety. The company maintains training records. In addition, every new employee or staff member who takes on new responsibilities is trained in health and safety issues. Detection systems to avoid and address potential hazards to staff health and safety must be installed.

7. Prohibition on child labor

Our company complies with the recommendations of the International Labor Organization (ILO), the United Nations (UN) and national law prohibits child labor. Of all these standards,

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the strictest apply. Any form of exploitation of minors is prohibited. Working conditions that refer to slavery or are dangerous for minors are prohibited. The rights of minors must be protected. In case there are minors working under the above conditions the company must install informed policies and processes to change the existing situation. In addition, the company must adequately support minors to attend school.

All of the above meet the terms of ILO 79, 138, 142, 182 and proposal 146.

8. Prohibition of forced labor and disciplinary measures

All forms of forced labor such as freezing money, freezing personal documents are prohibited as they constitute a violation of basic human rights. The use of physical violence, mental or physical coercion and verbal abuse are prohibited. All of the above meet the requirements of ILO 29 and 105.

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Respect the environment

For the conduct of its business, we expect its suppliers to comply with all local and national environmental laws and regulations in place and to implement a risk assessment approach to detect, identify and evaluate potential environmental risks related to their activity.

Suppliers must recognize their duty of care for the wider environment and take all reasonable steps to minimize negative impacts to the environment at all stage of production.

- Implement an environmental management system
- Implement a continuous improvement plan and reduce the environmental impacts of its processing sites, ensuring a good waste management program, the elimination of air, water and soil pollution, the reduction of greenhouse gas emissions, the promotion of the use of renewable energies, the reduction of water and energy consumption and the appropriate management of hazardous chemicals
- Evaluate the impacts of their activity on biodiversity, the risks of deforestation and commit to supporting our action plan to identify and put an end to the import and export of products contributing to deforestation in our sectors
- Guarantee that staffs whose activities have a direct impact on the environment, are trained competent and have the necessary means for effective performance of their roles and missions.



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