

TOGETHER@transparency

FRAMEWORK OF ETHICS FOR SUPPLIERS AND SUBCONTRACTORS



Introduction

For the Rion-Antirion Bridge, the fulfillment of the fundamental concession contractual obligations pertaining to the construction and the operation of the Bridge has been established since a long time ago.

The new era in the life of the Bridge is that of the voluntary moral commitment that started through the corporate responsibility towards the community and the environment.

In the current period and particularly in these specific circumstances, the corporate entities of the Bridge consciously turn to transparency that shall govern their relations with the suppliers and subcontractors that you are.

Such a noble objective requires, as a starting point, an open dialogue during which all necessary information will be presented and clarifications and opinions will be exchanged.

The aim is a relation marked by the mutual moral commitment which will be made official by countersigning the present code of ethics that will henceforth govern the relations between the company and its suppliers/subcontractors.

So, we propose you to consult here below the framework/code of principles inspired by the guidelines of the United Nations Global Compact in order for you to be aware in advance of the policy towards which we are heading for managing in the future our contractual and non-contractual cooperation.




Suppliers' Code of Conduct

The Code of Conduct for suppliers reflects the expectations of GEFYRA S.A. and GEFYRA LITOURGIA S.A. on labor standards and business practices. Our Code of Conduct was drafted based on the 10 principles of UN Global Compact (see Annex), which are consistent with our corporate principles.

Respect and transparency are for GEFYRA S.A. and GEFYRA LITOURGIA S.A. the major rules that govern the way they treat their subcontractors and suppliers. All potential suppliers are provided equal opportunities for the establishment of business relationship with our companies on the basis of objective criteria. Both corporate entities of the Bridge are committed to ensure fair transactions with all our suppliers.

We expect our suppliers and associates to apply the best business ethics practices, to have a social and environmental sensibility and to observe the following:

1. Comply with both the Greek laws and regulations in force, as well as with the internationally established rules of trade;
2. Ensure fair competition, without offering bribes or benefits in form of gifts in order to win favor;
3. Ensure the fair and honest treatment of their employees;
4. Respect human rights;
5. Eliminate all forms of forced or compulsory labor;
6. Ensure that no child labor is used;
7. Ensure safe and human working conditions, strictly fulfill all Health & Safety obligations in workplaces;
8. Operate their company by respecting the environment and observing the environmental legislation in force;
9. Offer products/services that comply with the quality and safety specifications in force;
10. Deliver the agreed upon services/products and observe and comply with the terms of the relevant agreements.



The present Code of Deontology and Conduct shall be executed by and applies to all suppliers of GEFYRA S.A. and/or GEFYRA LITOURGIA S.A. It concerns all employees who are directly or indirectly employed by our suppliers, including their occasional, seasonal, part-time etc. employees. Our suppliers shall take all necessary measures and ensure that their employees and all their agents are covered and observe the present Code.

GEFYRA S.A. and GEFYRA LITOURGIA S.A. are entitled to monitor and evaluate their suppliers in observing the above terms which constitute contractual and ethical obligations of their suppliers.

All terms of the present Code, which will be uploaded to the website of GEFYRA S.A. (<http://www.gefyra.gr>), as each time in force, are considered to be material and binding on all suppliers of GEFYRA S.A. and/or GEFYRA LITOURGIA S.A. throughout the term of their cooperation with us. Any amendments of the Code would be notified to our suppliers in any appropriate way, will be uploaded to the Gefyra website and be valid from then on.

Breach of the Code terms: GEFYRA S.A. and GEFYRA LITOURGIA S.A. reserve the right to promptly and harmless for themselves terminate the contract each time in force and the professional cooperation in general with a supplier in case the latter breaches a material term or repeatedly breaches a term/terms of the present Code or does not take the necessary remedial measures within a reasonable period of time. The present Code prevails over any other general or specific previous or subsequent agreement made with the supplier.

The Supplier took cognizance, approves and accepts all the above:

For the Supplier:

Date:

Stamp of the Supplier/Subcontractor:

Signature of the legal representative:

Name of the legal representative



ANNEX

The UN Global Compact's 10 principles

The UN Global Compact's 10 principles in the areas of human rights, labor, the environment and anti-corruption enjoy universal consensus and are derived from:

- The Universal Declaration of Human Rights
- The International Labor Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

These Principles are

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labor

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labor;
- Principle 5: the effective abolition of child labor; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.