

# **ALTERRA CODE OF CONDUCT**

## **LEGAL, ETHICAL, SOCIAL RESPONSIBILITY & ENVIROMENTAL POLICY**

### **PURPOSE**

**ALTERRA** 's Code of Conduct defines the non-negotiable minimum standards which all employees, managers and executives within **ALTERRA** are expected to respect and adhere to. The policy is based on the values of **ALTERRA**, and its implementation is continuous.

### **INTRODUCTION**

**ALTERRA** is committed to conduct its business in an ethical, legal, and responsible manner. **ALTERRA**, has established this Social Responsibility Code of Conduct as an application and is committed to ensuring that this code is respected in all their activities, all over the world.

**ALTERRA** expects its suppliers and/or contractors to be in line with the requirements set by this policy.

Recognized standards as the Universal Declaration of Human Rights (UDHR) or the International Labour Organization (ILO) conventions were used as references in preparing this code. The principles below refer to these standards.

### **LEGAL COMPLIANCE**

All business activities of **ALTERRA** conform to all applicable National, European, and international legal requirements and **ALTERRA** standards pertaining to employment and manufacturing. **ALTERRA** practices also comply with applicable anti-bribery & anti-corruption rules and regulations in all their business activities.

### **PROHIBITION OF DISCRIMINATION, INTIMIDATION & HARASSMENT**

**ALTERRA** does not engage in any discriminatory practices. Discrimination means any distinction, exclusion or preference limiting equality or opportunity of treatment in employment or occupation, which may be based on color, sex, religion, language, political opinion, age, national, social or ethnic origins, family obligations or any other considerations in this matter. Intimidation of any kind is prohibited towards any employee, their families or close associates. **ALTERRA** also commits to a workplace free of any kind of harassment. Grievance & whistle-blowing mechanisms are in place accessible by all employees.

## COMPENSATION & BENEFITS

The company ensures that no wage is lower than the applicable legal minimum. **ALTERRA** does not deduct or withhold pay for disciplinary reasons or force terms and conditions for employment. Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Relevant training of personnel takes place in all cases.

## WORKING HOURS

**ALTERRA** ensures that applicable legal restrictions on working hours are met. The maximum allowable working hours per week are as defined by national law and the corresponding standards of the International Labour Organization. Overtime is restricted according to local legal and contractual obligations. Employees have at least one day off per week, apart from exceptional circumstances and for a limited period of time. The work organization provides for rest breaks as necessary, in order not to affect the safety and health of the employees.

## PROHIBITION OF CHILD LABOUR

**ALTERRA** does not accept employment of children aged below 18. General educational and training programs for children in schools or other institutions are not included in this limitation. This is also enforced in cooperating entities & suppliers as a part of the **ALTERRA** supplier evaluation procedure either by own means or third-parties.

## PROHIBITION OF FORCED LABOUR

**ALTERRA** does not use forced or compulsory labour, meaning all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. Retention of identity documents from personnel upon commencing employment is forbidden. No fees are paid for employment and no debts are used to secure labour. All employees are free to terminate employment at any time without penalty. Aforementioned requirements are also required of our supply chain and are enforced either by own means or third-parties as a part of the **ALTERRA** supplier evaluation procedure.

## **FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING**

**ALTERRA** recognizes and respects employees' freedom of association and their right to freely choose their representatives and ensures that employee representatives do not suffer any discrimination. The company also recognizes employees' right to collective bargaining.

## **HEALTH & SAFETY AT WORK**

**ALTERRA** ensures that the workplace and its environment (machinery, equipment and processes, chemical agents, etc) do not endanger the physical integrity or health of employees. Action to reduce the causes of accidents and improve working conditions is the object of ongoing programs. Training related to safety and health in their work occupation is provided to employees. Employees have access to drinking water, sanitary equipment and social rooms, built and maintained in accordance with relevant legal requirements. In the workplace, emergency exits, fire protection equipment and proper lighting are provided as well as dedicated spaces for smokers and non-smokers.

## **ENVIRONMENT**

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment shall at least meet legal requirements or exceed them. Further procedures are in place to ensure that recyclable materials like paper, aluminum & glass are collected and forwarded for recycling.

For ALTERRA S.A.

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Human Resources Director

*For any questions, suggestions, or concerns, please contact us at: [hralterra@alterra.gr](mailto:hralterra@alterra.gr) either by name or anonymously. All communication will be confidential*