

SUPPLIER CODE OF CONDUCT



GROUP OF COMPANIES

Supplier Code of Conduct

Introduction

OTE and its affiliates (OTE Group – A Member of DT Group) act in accordance with **OTE Group Code of Conduct** and **Code of Human Rights & Social Principles**.

Based on OTE Group core values addressing business ethics, social and environmental commitments, OTE Group requires the Supplier to adhere to the hereafter listed Principles (as defined below) which will be attached to the contract entered between them (the “Contract”). The Supplier shall do its utmost to implement these Principles through its whole supply chain. This Supplier Code of Conduct is not intended to replace the laws and regulations in force in any country where OTE Group suppliers operate. It seeks to encourage and respect these laws and regulations, and ensure that they are faithfully and effectively enforced.

THE PRINCIPLES

1. Compliance with National and European Law

In addition to complying with the following provisions as detailed in sections 1 to 6 below, the Supplier shall always comply with applicable laws, regulatory provisions and the contractual obligations as agreed between the Supplier and OTE Group (“the Parties”). This shall include the US Foreign Corrupt Practices Act and the UK Bribery Act where applicable. Furthermore, the Supplier shall adhere to any international trade sanctions (including embargoes) which shall include any sanctions that may be in force as a result of a resolution passed pursuant to Chapter VII of the UN Charter by the UN Security Council, and any sanction that may have been imposed by the European Union. The Parties agree that adhering to this Supplier Code of Conduct is a main contractual obligation under the Contract. The Supplier shall bind its contractors and/or subcontractors (herein after referred to as “Subcontractors”) to the Principles of this Supplier Code of Conduct insofar as they are involved in provisioning deliverables under the Contract.

2. Underlying Principles

The Supplier shall respect internationally proclaimed human rights and shall avoid being complicit in human rights abuses of any kind. The Supplier shall respect the personal dignity, privacy and rights of each individual. Forced labour and slavery in all forms are forbidden. Furthermore, the Supplier shall adhere to all standards drawn up by the International Labour Organization (ILO).

3. Social Responsibility Practices

3.1 Freedom of Association and Right to Collective Bargaining

The Supplier shall seek to implement internationally recognized standards, e.g. ILO Conventions, without violating national legislation. It shall ensure that its employees and representatives including temporary (agency) workers may openly express themselves in their company concerning matters related to their working conditions.

3.2 Child Labour

Child labour is strictly prohibited. “Child labour” means the definition of ILO-IPEC and of Article 32 of the United Nations Convention on the Rights of the Child (UNCRC). If any child is found working at the premises of the Supplier, the Supplier shall immediately take steps to redress the situation in accordance with the best interests of the child.

3.3 Diversity and Non-Discrimination

The Supplier shall prohibit and fight negative discrimination based on race, colour, sex, sexual orientation, language, religion, political or other opinion, national or social origin, property, birth or other status, and shall promote diversity, equality of opportunity or treatment in employment and occupation. The Supplier shall treat all employees with respect and shall not use corporal punishment, mental or physical coercion, any form of abuse or harassment or threat of such treatment.

3.4 Remuneration

The Supplier shall provide remuneration according to national legal standard on minimum wage and avoid any wage deductions as disciplinary measure. Where no national legal standards exist, the remuneration shall be sufficient to meet basic needs (ILO C131 – Minimum Wage Fixing Convention). The basis on which workers are paid shall be clearly conveyed to them in a timely manner. The Supplier shall not use deductions from wages as a disciplinary measure.

3.5 Working Hours

Working hours, including overtime, shall comply with applicable local laws. Where no national legal standards exist, ILO standards shall apply. The Supplier shall respect the individual worker's need for recovery and secure that all workers have the right to adequate leave from work with pay.

3.6 Health and Safety

The Supplier shall provide its workers with a safe and healthy workplace and should implement effective programs to – where necessary – improve the working environment. The Supplier shall do its utmost to control hazards and take necessary precautionary measures against accidents and occupational diseases. The Supplier shall provide adequate and regular training to ensure that workers are educated on health and safety issues. This shall include provision and instructions to use appropriate personal protective equipment. The Supplier shall secure that, where it provides accommodation, it shall be clean, safe and meet the basic needs of the workers, and, where appropriate, for their families. The Supplier is encouraged to implement a Health & Safety Management System based on international standards such as OHSAS 18001 or similar.

4. Environmental Responsibility Practices

4.1 Environmental Protection

The Supplier shall take a precautionary approach towards environmental challenges (e.g. climate change, biodiversity, etc.), undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies.

The Supplier shall act in accordance with relevant local and internationally recognized environmental standards and applicable local laws, whereby the highest standard shall be applied especially including ROHS and WEEE (as detailed further in the respective Contract).

The Supplier shall minimize its environmental impact and should implement measures contributing to pollution prevention and the protection of the environment.

OTE Group expects Supplier to follow the rules of circular economy during the whole product life cycle: conception, development, production, transport, use and disposal and/or recycling. The Supplier shall minimize or strive to avoid hazardous air emissions, energy consumption and CO2 emissions. In particular, the Supplier shall

develop products and services that feature low energy consumption and CO2 emission reduction during the whole life cycle.

The Supplier shall obtain and adhere to all necessary permits and strive for the implementation of an Environmental Management System based on international standards such as ISO 14001.

4.2 Natural Resources and Waste Management

The Supplier shall limit the use of materials and resources, including water, when sourcing or producing goods in order to minimize its environmental impact.

The Supplier is encouraged to track the source of conflict minerals, to promote transparency along its own supply chain and to put in place measures for this purpose. The use of rare resources shall be limited or avoided where possible. The waste produced by all its activities shall be identified, monitored and managed. The Supplier shall strive to reduce the waste. Waste treatment shall be in accordance with applicable environmental laws.

5. Prohibited Business Practices

5.1 Anti-Corruption

The Supplier shall refrain from any form of corruption or actions that could potentially be construed as such.

The Supplier may not offer, promise or grant illegal benefits to national or international public officials or decision-makers operating in the private sector in order to achieve a preferential treatment or a favourable decision; same applies when dealing with donations, gifts or invitations to business meals and events.

The Supplier may not allow itself to be promised or offered advantages, and shall not accept the same if this may or shall create the appearance to the party bestowing the advantages that it can thus be influenced in business decisions. Likewise, the Supplier may not request advantages.

The Supplier shall avoid conflicts of interest that may lead to risks of corruption.

If the Supplier is also a customer of OTE Group, it shall not draw any unfair advantages from this and shall keep procurement and sales strictly separate.

Supplier undertakes, and requires its directors, officers, employees, suppliers, affiliates, Subcontractors and each respective representative (hereinafter the "Third Parties"):

- to respect the rules of this Section 5.1 together with the regulations as stated in Section 1 ("the Rules"), by appropriate means for the effective implementation and maintaining of a compliance framework;
- that (i) the Third Parties involved in the performance of the Contract comply with the Rules and that (ii) every necessary means used by Third Parties for the performance of the Contract comply with the Rules.

In order to ensure compliance with the Rules for the duration of the Contract, Supplier shall provide on demand and at all time to OTE Group all elements requested to establish such compliance, and shall inform OTE Group without any delay, when it knows or has reason to know, of any failure to comply with the Rules by itself or any Third Party, as well as the corrective measures adopted to ensure compliance with the Rules.

A material non-compliance with the Rules may trigger a termination right of the Contract in accordance with its provisions.

5.2 Competition

The Supplier shall respect the rules of free and fair competition in all business relation, in particular not act against any competition and/or antitrust law.

5.3 Sponsorship

All sponsoring measures by Supplier must be in accordance with current legislation.

5.4 Political Contributions

The Supplier shall not donate money or grant any monetary benefits to any political party unless permitted by law.

5.5 Money Laundering

The Supplier shall take all measures to prevent money laundering within its sphere of influence.

5.6 Data Security and Data Protection

The Supplier shall adhere to all applicable data protection laws and all specific data protection and security requirements agreed to in the Contract.

6. Monitoring and Social, Environmental, Compliance Audits

In order to ensure compliance with the Principles as outlined in this Supplier Code of Conduct for the duration of the Contract, the Supplier shall provide on demand all elements requested to establish such compliance, and shall inform OTE Group without any delay, when it knows or has reason to know, of any failure to comply with the Principles by itself or by any Subcontractor, as well as the corrective measures adopted to ensure compliance with the Principles.

In case of modification of the legal and/or regulatory framework as well as any judicial decision that would imply violation of the Principles by one of the Parties, OTE Group may introduce the relevant modifications that the Supplier shall adhere to.

If not covered in the Contract, the following shall apply for Social, Environmental and Compliance Audits: OTE Group and/or its authorized representative are entitled to conduct monitoring activities towards the Supplier and its Subcontractors to effectively

evaluate the Supplier's and Subcontractors' actual conformity with the Principles. This includes the right for OTE Group and/or its authorized representative to perform audits including on-site inspections, questionnaires and/or interviews with selected employees at Supplier's premises, construction sites and/or other locations where work is carried out on behalf of the Supplier. The Supplier acknowledges that OTE Group has the right to request and receive further information (e.g. through the OTE Group evaluation systems/EcoVadis/E-TASC/self-assessments), if deemed necessary. At the request of OTE Group, the Supplier shall inform OTE Group of the measures adopted to ensure compliance with the Principles. In the case of non-conformity with the Principles, any non-conformity shall be notified to OTE Group and followed by a dedicated improvement plan that needs to be fulfilled in due course.

For more information or clarification regarding the principles of this Code, you may address to the following communication channels:

Hellenic Telecommunications Organization S.A. (OTE S.A.)
OTE Group Compliance Office,
99 Kifissias Ave., 15124 Maroussi, Athens, Greece

or

Hellenic Telecommunications Organization S.A. (OTE S.A.)
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Phone: +30 2106112345

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