

SUPPLIER CODE OF CONDUCT AND ETHICS

Introduction

Eurobank, adheres to the commitments as set in the Bank's Procurement Policy but also in the Group's Sustainability Policy, and with the present document of Supplier Code of Conduct and Ethics establishes the terms of cooperation, emphasizing hereby on the issues according to the pillars of Environment (E) – Society (S) – Corporate Governance (G).

The **Supplier Code of Conduct and Ethics** is directly related to and consistent with:

- A. **Eurobank's Procurement Policy** and all ESG issues highlighted in this Policy.
- B. the **Group's Sustainability Policy**.
- C. Eurobank's **Code of Conduct and Ethics** and the requirements for defining relations with Suppliers and supporting sustainable and socially responsible practices.

In this context, the aim of the Supplier Code of Conduct and Ethics is to function as a set of guidelines that defines the basic standards of ethical conduct, values, and principles, which Eurobank expects all its Suppliers to adopt, but also to promote in their dealings with employees, their suppliers, contractors, and customers.

The Supplier Code of Conduct and Ethics applies to all Eurobank's Suppliers who are invited to take note of and agree with it, either a) by awarding, in parallel with the General Terms and Conditions, or b) through a relevant link on the Bank's website.

Eurobank encourages compliance with this Code and of its existing Suppliers prior to its enactment, while considering, in the periodic evaluation of cooperation with them, their progress in relation to the fulfillment of these requirements. At the same time, during the selection process of new Suppliers, Eurobank evaluates their alignment with the specific Code.

Fundamentals

2.1 Environment

Environmental Compliance: Suppliers are obliged to comply with all applicable environmental legislative requirements and monitor developments to improve their environmental performance.

Sustainable Production: Suppliers are committed to implementing sustainable production practices to reduce their environmental footprint and promote sustainability, while encouraging the development and dissemination of environmentally friendly technologies.

Protection of Natural Resources: Suppliers must implement policies aimed at the protection and sustainable use of natural resources, such as water, energy, and raw materials.

Material Recycling: Suppliers should promote material recycling and the use of recyclable materials, where feasible, with the aim of reducing waste.

Emission Reduction: Suppliers are committed to reducing greenhouse gas and other harmful emissions by implementing technologies and processes with lower environmental impact.

Product Sustainability: Suppliers should encourage the development and production of products that are sustainable in use and at the end of their life.

Working with Stakeholders: Suppliers should engage with stakeholders, including customers, Suppliers, and communities, to exchange ideas and practices to improve environmental performance.

Supplier Environmental Engagement and Continuous Improvement: Eurobank is committed to engaging with its Suppliers to support the continuous improvement of their environmental performance.

This engagement may include dialogue with Suppliers, ESG questionnaires, feedback on assessment results, awareness-raising, meetings, training, or guidance to identify operational gaps and develop corrective or improvement actions, where necessary.

Through this engagement, Eurobank aims to support suppliers in identifying opportunities to reduce their environmental footprint, including greenhouse gas emissions, energy consumption, waste generation, water use and to encourage the adoption of environmental management practices and environmentally friendly technologies.

2.2 Labor Practices and Human Rights

Respect for Human Rights: Suppliers should respect and defend the fundamental human rights of their employees, as defined in the framework of the United Nations Universal Declaration of Human Rights and the Basic Conventions of the International Labor Organization (ILO) and shall comply with all applicable labour, employment and human rights legislation, as in force from time to time.

Fair Working Conditions and Treatment: Suppliers should ensure that their employees have fair and lawful working conditions, should ensure continuous improvement, uninterrupted provision, and uninterrupted maintenance of a working environment, which will allow their employees to perform their duties free from any kind of moral pressure or harassment.

Working Time: Suppliers should ensure that employees' maximum working hours, overtime and leave fully comply with applicable national legislation and International Labor Organization standards on fixed working hours. Any overtime work must be compensated in accordance with the law and based on the employee's free will.

Freedom of association: Suppliers must respect the freedom of association and the right of employees to join or form organizations of their choice and bargain collectively.

Freedom from Discrimination: Suppliers shall ensure equal treatment and shall not engage in any form of discrimination based on gender, ethnicity, religion, age, or other characteristics.

Child Labor: Suppliers are prohibited from using child labor.

Humane Treatment & Disciplinary Practices:

Suppliers must maintain a workplace free from inhumane treatment. The use of corporal punishment, abuse (physical, sexual, verbal, or mental), harassment, and intimidation is strictly forbidden. All disciplinary practices must be fair, respectful, and compliant with international human rights standards.

2.3 Health and Safety at Work

Safe Working Conditions: Suppliers are obliged to ensure the creation and maintenance of safe and healthy working conditions for all employees.

Training and Information: Suppliers should provide adequate training and information on safety procedures and risk prevention at work.

Supply of Protective Equipment: Suppliers should provide and encourage the use of appropriate protective equipment and equipment for the safe execution of operations.

Cooperation with Competent Authorities: Suppliers should cooperate with the competent authorities to comply with all legal and regulatory requirements regarding occupational health and safety.

Risk Prevention and Management: Suppliers are obliged to identify, assess, and reduce occupational health and safety risks by promoting preventive practices.

Assumption of Responsibility:

Suppliers shall assume responsibility for any accident or incident affecting the health and safety of their employees.

Emergency Situations: Suppliers should be able to implement contingency plans aimed at anticipating, identifying, and assessing emergencies and incidents, minimizing their impact on their human resources. Where suppliers provide worker accommodation, they are expected to ensure acceptable living conditions, including access to clean water, sanitation and basic services, in line with applicable legal and international standards.

Continuous Improvement: Suppliers should promote continuous improvement of health and safety practices, considering current developments and best practices in the field.

Eurobank reserves the right to apply enhanced due diligence, request evidence of compliance, require corrective action plans, monitor remediation progress, apply contractual remedies or terminate cooperation where material human rights risks, labour rights risks or violations are identified.

2.4 Corporate Governance

Institutional Compliance: Suppliers are committed to fully comply with all applicable laws and regulations regarding corporate governance. In addition, Suppliers are requested for certifications (n.x. ISO 9001, 14001, 14064, 50001) if any, as well as disclosures regarding their business footprint, ESG assessment results and Sustainability Reports.

Transparency and Information: Suppliers should support transparency and open communication by providing accurate and valid information about their activities.

Risk Assessment and Management: Suppliers are committed to implementing procedures and similar mechanisms for the assessment, identification, recording and management of risks in all areas covered by this Code and by all applicable legislative requirements and regulations governing their operation.

Business Continuity: Suppliers are committed to implementing appropriate procedures and/or business continuity plans for operations that support Eurobank's business activity.

Maintaining Business Integrity: Suppliers are committed to maintaining integrity in all their business activities, avoiding any form of fraud, corruption, bribery, or unprofessional conduct.

Avoidance of Conflicts of Interest: Suppliers should avoid and actively address conflicts of interest that may adversely affect corporate governance. Any personal relationship that may affect or be perceived as affecting their impartiality should be avoided. In addition, Suppliers should follow procedures that ensure their independence in relation to the individual other duties they perform. In case they become aware of a conflict of interest, they must inform Eurobank of such conflict.

Fight Against Corruption: Eurobank avoids transactions with suppliers who use practices that it considers fraudulent. Suppliers must refrain from any act of corruption, including actions related to money laundering.

Gifts & Hospitality: Suppliers must not offer or accept any gifts, rewards, or other incentives, which create or appear to create an obligation, affect the impartiality of each party, or constitute undue influence on a business decision. It is not forbidden to offer and accept small symbolic gifts given in the context of courtesy and communication, which leave no room for negative criticism.

International Financial Sanctions & Embargoes: Suppliers must monitor and comply with applicable international financial sanctions regulations.

Competition: Suppliers must respect free competition and not take any action that violates it.

Respect for Intellectual Property: Suppliers should respect intellectual property rights and not use or transmit information or transfer assets of their customer without permission.

Data Protection: Suppliers must respect and comply with all data protection laws.

Active Participation in Improvement: Suppliers should actively participate in corporate governance improvement processes by proposing and adopting best practices.

Promotion of the Supplier Code of Conduct and Ethics in the Supply Chain: Suppliers should have in place and apply procedures for notifying and ensuring compliance with the requirements of this Code to their Suppliers, indirect and direct, with whom they cooperate at the level of products or services on behalf of Eurobank.

Compliance and Related Controls

The provisions of this Code constitute guidelines for the business conduct of Eurobank's Suppliers.

Eurobank's existing and potential Suppliers must ensure their compliance with the provisions of this Code.

Eurobank's relationship with its Suppliers is based on mutual trust and respect. An important factor for maintaining and further developing the company's successful course is ensuring the implementation of the principles of sustainable development in its supply chain.

To this end, Eurobank will periodically review the compliance of its Suppliers with this Code.

However, Eurobank may request verification of the compliance of its Suppliers with this Code by one of the following methods and plan corrective measures, if necessary:

A. Evaluations

Eurobank's Suppliers should be able to work in harmony with the company in case they are asked to complete a questionnaire regarding the coverage of ESG criteria along with the submission of the relevant documents confirming their compliance with them.

Eurobank has the right to request further information or clarifications and Suppliers must respond immediately.

B. On-the-spot checks

Eurobank's Suppliers should be able to cooperate in cases where it is decided to carry out an audit at their place of establishment or at the location of their potential subcontractors.

The audit may be carried out by representatives of Eurobank, or Third Parties designated by Eurobank to verify the coverage of the ESG criteria of this Code.

In case the results of the evaluations or audits lead to findings of non-compliance, you must promptly take the necessary corrective actions in accordance with Eurobank's instructions.

In this context, a time frame will be given for the implementation of corrective actions, while in case of substantial non-compliance, measures may be taken, including the suspension or termination of our cooperation.

Where opportunities for improvement are identified, Eurobank **may collaborate** with suppliers to create an improvement plan, offering advisory support. This action aims to support suppliers in improving their environmental performance and strengthening sustainability in the value chain.

Non-compliance reporting mechanism - complaints and complaints mechanism

Eurobank applies the **zero-tolerance rule** to incidents of fraud, corruption, violation of legislation related to money laundering as well as any other form of illegal, irregular, unethical, dishonest, unprofessional, or unethical behavior that materially and financially damages Eurobank.

In this context, Eurobank expects its Suppliers to report any concerns regarding compliance with this Code, as well as violations that may originate from Eurobank's employees or other Third Parties.

The report may be submitted anonymously, but the practice of reporting by name is encouraged for reasons of reliability and follow-up to issues as they arise. Eurobank ensures that the confidentiality of the information is maintained and that no action will be taken against the reporter, provided that the specific complaint is made in good faith.

Suppliers may submit the relevant reports to the following email address: ethicshotline@eurobank.gr either to the telephone line 214-4058990, leaving a message on voicemail (available 24/7, 365 days/year), or by sending a letter to the address of Group Compliance: 2-6 Pesmazoglou Street, 105 59, Athens, to the attention of the Report Receiving and Monitoring Officer (RRMO).