



PUBLIC POWER CORPORATION

Suppliers / Partners Code of Conduct

effective as of September 01, 2025



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1. INTRODUCTION

The Public Power Corporation S.A. (hereinafter referred to as "the Company"), has elevated the promotion of Sustainable Development as a fundamental and integral element of its strategic planning. In this context, it undertakes initiatives and implements appropriate Policies to provide high-quality services to its customers, to manage the sustainable footprint of the Company, its subsidiaries, as well as its suppliers, contractors, and generally those collaborating with it, on local communities and the environment, aiming for economic development, environmental care, and social welfare.

In the framework of shaping and implementing its strategic planning, the Company promotes innovative ideas, techniques, applications, and practices related to the nature of its economic activity and aimed to address environmental and social issues, improving the Company's competitiveness at both national and international levels.

Regarding the Procurement Policy, the Company has adopted and implements, among others, Regulations and Policies that define the required behaviors, which at minimum concern issues of managing privileged information, protection of personal data, conflicts of interest, corruption and bribery, money laundering, and others.

This Code complements the [Regulation for Works, Supplies, and Services](#) and is applied in conjunction with it.

The Company aims at the unwavering establishment and application of ethical practices and relationships with its partners, and for this purpose, this Code has been drafted as a basic standard of ethical behavior, which includes guidelines for the business conduct of the Company's suppliers and partners in general. The term "Supplier/Partner" refers to any natural or legal person who registers in the Suppliers Registry and subsequently contracts with the Company, specifically suppliers, contractors, business partners, as well as external associates who provide works, goods, services, or act on behalf of the Company.

All the above, in the context of creating relationships of mutual trust with transparency, honesty, and mutual respect, must respect and comply with the content of the Code, meet their obligations, as well as consider the same principles in their own transactions with third parties.

2. SCOPE OF APPLICATION

This Code is addressed to any third party (natural or legal person) who contracts with the Company in any collaborative relationship (hereinafter Supplier/Partner). It also applies mutatis mutandis to the Company's subsidiaries.

3. PRINCIPLES GOVERNING THE CODE

The Company has adopted the ten general principles of the UN Global Compact (UNGC), the largest voluntary initiative for corporate sustainability. In this context, it takes actions and responds to its responsibilities in the areas of human rights, labor conditions, environmental protection, and anti-corruption, serving the goal of long-term business success. Sustainable business development in a globally competitive environment is achieved through diligent management and improvement of performance regarding environmental protection, generally accepted human, personal, and social rights, and the adoption of related best practices in corporate governance as required by law. It is noted that the establishment of Sustainable Development Goals (SDGs) by the United Nations has led to the adoption of new practices, vital for assessing the sustainability of an energy company, aimed at measuring, disclosing, and managing Environmental, Social, and corporate Governance issues, known as ESG criteria.

The Company's Suppliers/Partners must comply with the applicable legislative and regulatory framework, act in accordance with the principles of this Code, and actively contribute to sustainable development efforts by responsibly implementing similar practices themselves. They must also respect internationally recognized human rights and avoid involvement in any violations thereof.

3.1 ENVIRONMENTAL CRITERIA (E)

In the context of the Sustainable Development Goals (SDGs), the Paris Climate Agreement (2015), and the European Green Deal (2019), monitoring international developments, improving environmental performance, and identifying risks and opportunities arising from climate change are key areas for strengthening the Group's environmental policy. In this context, emphasis is placed on the impact of its activity on the environment, living and non-living natural systems, and the planet, as well as the effects of climate change on the Company itself, aiming to reduce the environmental impacts of its activities and promote the sustainability of natural resources. Prioritizing environmental sustainability is vital for mitigating climate change and minimizing harm

UN Sustainable Development Goals enhanced that are reinforced by adhering to environmental criteria



to ecosystems. The Group prioritizes compliance with environmental legislation and, to this end, proactively identifies environmental challenges within its sector of activity, takes initiatives to promote its environmental responsibility, and encourages the development and dissemination of environmentally friendly technologies.



Considering the UN Sustainable Development Goals, we expect from the Company's Suppliers/Partners:

Environmental Compliance

The Company's Suppliers/Partners must comply with environmental legislation and ensure they obtain the necessary national and local environmental permits and requirements for the business activities they undertake on behalf of the Company.

Initiatives and actions for Environmental protection

Given that environmental protection and the development of corporate environmental culture are key priorities for the Company, the undertaking of relevant initiatives is expected and positively evaluated, especially by businesses falling within the scope of relevant legislation, such as:

- Participation in programs and actions for the prevention and alignment of their activities with the energy and climate goals set through the National Energy and Climate Plan, as well as with the new requirements for the application of ESG criteria.
- Initiatives and actions for environmental protection and the reduction of environmental footprint, with minimal impact on biodiversity and ecosystems.
- Development and dissemination of environmentally friendly technologies to achieve the energy - green transition.
- Adoption of circular economy principles aimed at preventing or minimizing waste and systematically improving resource efficiency through methods of maintenance, reuse/redistribution, remanufacturing, and recycling as a key element of their long-term environmental policy.
- Prevention and, where necessary, effective management of environmental pollution from chemicals, hazardous materials, gas emissions, or the improper management and utilization of liquid and solid waste related to their activities. They should have and implement procedures for reducing, safely disposing of, and properly managing waste generated from their activities by applying appropriate measures for conservation, reuse, and recycling or disposal.

- Awareness, motivation, guidance, and training of their staff to achieve environmental goals and continuously develop a corporate environmental culture.

The Company encourages and positively evaluates the adoption and implementation of environmental and energy management systems (e.g., ISO 14001, ISO 50001, ISO 14064, etc.). by its Suppliers/Partners

3.2 SOCIAL CRITERIA (S)

The Group is committed to maintaining an appropriate work environment for its employees. In highest priority is the respect and protection of internationally recognized human rights, ensuring suitable working conditions, supporting freedom of association and the right to collective bargaining, accepting diversity, respecting privacy and the right to personal development, and not tolerating any form of forced labor or child labor.

The Company expects its Suppliers/Partners to uphold and provide the same principles and guarantees in their own professional environments and areas of activity, supporting strong social values.

UN Sustainable Development Goals that are reinforced by adhering to social criteria



In alignment with the practices adopted by the Company, we expect from Suppliers/Partners:

Protection and respect in human rights - Fair treatment of employees

Suppliers/Partners must take proactive measures to defend, respect, and uphold human rights by adopting best labor practices, and ensuring mechanisms for

remedy and redress in case of violations. They must also respect diversity, prohibit any discrimination, and provide all employees with equal career opportunities.

The Company has adopted a [Human Rights Policy](#) and seeks to collaborate with suppliers and third parties that adopt similar policies in their businesses.

Provision of appropriate working conditions

Suppliers/Partners must create and maintain suitable working conditions for their staff, paying all legal wages, social security contributions, and any compensation, providing the required leave, and complying with applicable laws, regulations, and collective labor agreements.

Employment terms, including working hours and overtime, must be fair and reasonable and in accordance with the provisions of applicable labor legislation.

Health and safety at work

Suppliers/Partners must establish and maintain appropriate health and safety conditions in the workplace with the necessary infrastructure for their staff as required by law, providing appropriate information and ensuring the required work equipment and personal protective gear for employees to prevent the risk of injury or accident.

Respect for association and collective bargaining rights

Suppliers/Partners must show respect for the rights of association and collective bargaining, ensuring that participants in legally recognized labor unions are not subjected to intimidation or harassment.

No tolerance for Workplace Violence and Harassment

Suppliers/Partners must take measures to prevent and combat any form of violence and harassment that leads or may lead to physical, psychological, sexual, or economic harm, whether isolated or repeated, and occurs during work, is connected to it, or resulting from it, with a simultaneous prohibition of retaliation in case of reporting/complaint of a specific incident.

Prohibition of child labor

Suppliers/Partners must explicitly prohibit child labor and take measures to combat it, strictly adhering to the minimum age limit in hiring. They must ensure that contracts with their partners (suppliers, collaborators, etc.) include provisions that explicitly prohibit child labor.

Prohibition of forced labor

The Company's Suppliers/Partners must prohibit the use of any form of forced, compulsory, or bonded labor or human trafficking and show no tolerance for incidents and conditions that may favor any form of modern slavery.

Social responsibility and accountability

Suppliers/Partners are expected to operate with a focus on voluntary and social contribution, through cooperation with local communities, undertaking actions to defend human rights, achieve better quality of life, economic development, and progress.

Employee awareness and information

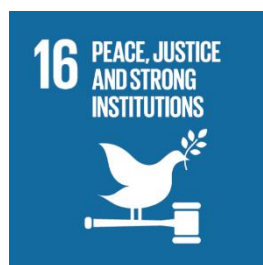
Suppliers/Partners should ensure the continuous information and awareness of their company's staff regarding the respect and protection of human rights through various means (e.g., training, workshops, newsletters) and encourage them to report abusive behaviors through mechanisms they have in place, for timely adoption of appropriate measures, with the goal of eliminating them.

The Company positively evaluates their voluntary implementation or certification to national and international standards for health and safety, human rights, and social responsibility (e.g., ISO 45001, ISO 26000, etc.) at work.

3.3 CORPORATE GOVERNANCE (G)

In the context of a healthy and creative collaboration with Suppliers/Partners, the Group emphasizes transparency and reliability in its transactions and applies best corporate governance practices. Beyond continuously improving its efficient operation for the benefit of its shareholders and stakeholders, it aims to create a business culture founded on the values of business ethics. No form of corruption, bribery, or other unethical or illegal behavior is tolerated within the Group. The Company's Suppliers/Partners must likewise refrain from practices that violate these principles and compromise the integrity of market transactions.

UN Sustainable Development Goals that are reinforced by adhering to governance criteria



Based on the practices adopted by the Company, we expect from Suppliers/Partners:

Transparency and reliability - No tolerance for acts of corruption-bribery

Suppliers/Partners are committed to ensuring and maintaining high standards of integrity, transparency, and reliability in their relationships and collaborations with all stakeholders. They must adopt principles and implement practices to combat corruption, bribery, extortion, and abuse in the context of their activity, adhering to a no tolerance policy for such phenomena in their own business transactions. This includes, among others, indicatively, the offering/promise/request/acceptance of gifts, hospitality, entertainment, and travel that do not fall within the scope of due business practice, as well as facilitation payments.

Respect for fair competition rules

Suppliers/Partners must refrain from any unfair actions and behaviors that distort competition, such as collusion activities/practices, price-fixing agreements, anti-competitive activities/practices, cases of fraud, market manipulation activities, and unfair competition practices.

Protection of personal data

Suppliers/Partners must comply with relevant laws and regulations for the protection of personal data, particularly the General Data Protection Regulation (GDPR), as well as for the adoption and implementation of appropriate and suitable technical and organizational measures for the secure processing of personal data of employees, customers, suppliers, and partners, considering, among other things, potential risks and technological developments.

Confidentiality

Suppliers/Partners must maintain confidentiality regarding the Company's affairs and activities and protect information concerning its commercial or other secrets, by signing a relevant confidentiality agreement. Especially those who may gain access to privileged information, as defined by stock market legislation, are subject to the specific relevant obligations under the law and any specific confidentiality agreement with the Company.

Security of business data

Suppliers/Partners are obliged to protect the business data they manage, as well as to ensure the security of information systems to prevent and eliminate cyber-attack phenomena.

Compliance with decisions on international sanctions against natural and legal persons

The Company's Suppliers/Partners are expected to comply with applicable International Sanctions against natural and legal persons, which are introduced by decisions of recognized international bodies (e.g., European Union (EU), UN Security Council, US Office of Foreign Assets Control (OFAC)).

Quality and safety of provided products and services

Suppliers/Partners are committed to adhering to the quality and safety requirements for their products and services, as agreed with the Company and is recognized under international and national law.

Combating money laundering and the financing of terrorism

Suppliers/Partners must refrain from any activity or transaction related to money laundering or the financing of terrorism, in accordance with the [Group's corresponding Policy](#).

Prohibition of pursuing personal interests at the Company's expense (conflict of interest)

Suppliers/Partners commit to avoiding any situation that can be characterized as a conflict of interest, as defined in the Company's [Conflict of Interest Policy](#), and are expected to have mechanisms for preventing, identifying, and managing conflict of interest situations in their activities. Specifically, a Supplier/Partner who has any relationship with executives or employees of the Company that constitutes a conflict-of-interest situation according to the above Policy must promptly disclose it to the Company.

The Company positively evaluates the implementation of relevant management systems by Suppliers (e.g., ISO 27001, ISO 37001, etc.).

In addition to all the above, Suppliers/Partners must act to promptly detect and eliminate any inappropriate behavior noticed by their employees and partners, in compliance with the legislative and regulatory framework. They must also ensure the adoption - when required - of corrective measures to manage risks or eliminate phenomena of illegal or criminally punishable behavior with continuous empowerment, information, and appropriate training of staff to this end.

4. COMPLIANCE AND ADHERENCE TO THE CODE

The Company aims to ensure the unhindered implementation of sustainable development principles in its supply chain, fostering relationships of mutual trust and respect with its Suppliers/Partners. Both the Company and each Supplier/Partner of the first tier of the supply chain (direct supplier or contractor or service provider) are responsible for continuously monitoring compliance with their contractual obligations. In this context, the compliance of Suppliers/Partners with this Code will be reviewed, and if deemed necessary, the Company will propose corrective measures.

Prospective Suppliers/Partners may be required, at a pre-contractual stage, to complete a specially designed questionnaire from the Company for their evaluation

on sustainable development issues and submit the relevant documents/evidence of their compliance.

The Code will be communicated to all Suppliers/Partners of the Company, who are asked to accept it and contribute, to the extent applicable to them, to its observance. Suppliers/Partners can demonstrate their compliance with this Code through their own Code of Conduct or other policies that are applied and cover the relevant requirements for sustainable development principles. In any case, in the context of communicating and promoting the Code in the supply chain, and ensuring compliance with its requirements, they will confirm in writing that they have received it, understood it, and agree to comply with its content (Appendix A - Declaration of Compliance with the principles of the Suppliers/Partners Code of Conduct).

The Company reserves the right to check and verify the compliance of its Suppliers/Partners, if deemed necessary, during their collaboration, even by conducting on-site inspections at their premises, possibly through third-party collaborators.

Suppliers/Partners must provide, upon request, all required information documenting compliance and immediately inform the Company when they become aware or, for any other reason, know that they are unable to comply with the Code. This information should also include corrective measures already taken or to be taken to restore their compliance with the Code.

4.1. REPORTING VIOLATIONS

In case of non-compliance of Suppliers/Partners with the principles of this Code, combined with the failure to timely identify and the possible inability to resolve issues that may arise, the Company may, on a case-by-case basis and evaluating the severity of the violation, terminate the collaboration with them.

Violations of the Company's Suppliers/Partners Code of Conduct must be reported through the approved and available reporting channels, as defined in the Company's [Enforcement Policy and Report/Complaint Handling Procedure](#) in application of Law 4990/2022 (whistleblowing), which ensure the required confidentiality and protection of the reporting person.

5. VALIDITY, MONITORING & AMENDMENT OF THE CODE

This Code and any subsequent amendment thereof apply to the Suppliers/Partners selection procedures that follow its approval. Procedures that are in progress before each amendment of the Code continue to be conducted under the version that was in effect at the time of their initiation.

The Company expects compliance with the principles of this Code from its existing Suppliers/Partners and will consider their progress in adhering to it during periodic evaluations of their collaboration.

This Code is fully applicable from 01.09.2025.

The Company reserves the right to make reasonable amendments to the requirements of this Suppliers/Partners Code of Conduct which will result from amendments to the Company's Code of Conduct, as well as amendments related to the policies referred to in the Code and/or the principles governing it. In this case, Suppliers/Partners will be informed in a timely manner and are expected to accept these reasonable amendments.

The Procurement Group Function and the Legal & Corporate Governance Group Function are responsible for revising and reissuing this Code whenever an amendment is required, according to the above.

The current version of the Code is available on the PPC website (www.ppcgroup.com).

6. APPENDIX A

DECLARATION OF COMPLIANCE WITH THE PRINCIPLES OF THE SUPPLIERS/PARTNERS CODE OF CONDUCT

Personal Information

Full name/Business name	
TIN	
Date ¹	

I hereby declare that:

I have been informed of the PPC S.A. Suppliers/Partners Code of Conduct, as communicated to me by the Company, I have read, understood, and agree to comply with its content and basic principles².

For *Name/Business name*

.....

Name and surname of signatory³

Job title

¹ Date of Signing the Declaration.

² In case of amendment of the legal and/or regulatory framework, the Company may introduce relevant modifications, which the Supplier/Partner is obliged to observe.

³ Of the legal or duly authorized representative.