



Suppliers Code of Conduct

December 2025

1. Introduction

Dear Partner,

Goldair Cargo S.A. is committed to delivering high-quality, ethically responsible logistics, freight forwarding and warehousing services to its customers. To achieve this, the Company maintains a certified Integrated Management System covering Quality, Environment, Occupational Health & Safety, Food Safety, Medical Devices, Information Security and Social Responsibility.

As part of this commitment, Goldair Cargo S.A. expects all its suppliers, subcontractors and business partners to adhere to the principles and minimum standards described in this Suppliers Code of Conduct, which is aligned with the SEDEX/SMETA framework, the UN Universal Declaration of Human Rights, the ILO core conventions, and the Greek National Climate Law 4936/2022.

2. Scope

This Code applies to all suppliers, contractors, subcontractors and service providers (including transportation partners) that provide goods or services to Goldair Cargo S.A.

By accepting commercial orders from Goldair Cargo S.A., suppliers acknowledge that they have read, understood and accepted the requirements of this Code, and that they will apply equivalent standards to their own supply chain.

3. Legal Compliance

Suppliers shall comply with all applicable national and international laws and regulations in the countries where they operate, including, but not limited to:

- Labour and employment law, including minimum wage, working hours and social security obligations.
- Occupational health and safety legislation.
- Environmental protection and climate-related legislation, including any waste, emissions and water-related obligations.
- Anti-corruption, anti-bribery and competition law.
- Data protection legislation, including the GDPR (EU) 2016/679.
- Customs, transportation and trade compliance regulations relevant to logistics activities.

4. Business Ethics

Suppliers shall conduct their business with the highest standards of ethical behaviour, including:

- a. Zero tolerance for bribery, corruption, kickbacks or facilitation payments in any form.
- b. Avoidance of conflicts of interest and prompt disclosure where they arise.
- c. Fair competition and respect for antitrust principles.

- d. Honest, transparent and accurate communication with Goldair Cargo S.A.
- e. Maintenance of accurate financial and operational records.
- f. A documented mechanism for reporting concerns about ethical misconduct (whistleblowing), accessible to their own employees and partners.

5. Human Rights and Labour Standards

Suppliers shall respect internationally recognized human rights and labour standards, including:

- No use of child labour, in line with ILO Conventions 138 and 182.
- No use of forced, bonded or compulsory labour, and no trafficking in persons.
- Recognition of the freedom of association and the right to collective bargaining.
- Provision of fair wages and benefits at least in line with applicable minimum wage legislation.
- Respect for legal working hours and provision of adequate rest periods.
- Zero tolerance for discrimination, harassment, violence or any form of abusive treatment.
- Respect for the dignity and personal data of all workers.

6. Health and Safety

Suppliers shall provide a safe and healthy working environment for all workers, including:

- a. Compliance with all applicable occupational health and safety legislation.
- b. Identification, assessment and mitigation of workplace risks.
- c. Provision of appropriate personal protective equipment, training and emergency procedures.
- d. Monitoring and continuous improvement of occupational health and safety performance.

7. Environment

Suppliers shall conduct their operations in an environmentally responsible manner, including:

- Compliance with all applicable environmental legislation and permits.
- Efficient use of energy, water and natural resources.
- Prevention of pollution and minimization of emissions to air, water and soil.
- Responsible management of hazardous and non-hazardous waste.
- Active contribution to climate change mitigation through monitoring and reducing greenhouse gas emissions.
- Support of the Company's 30% carbon intensity reduction target by 2030 (against the verified 2022 baseline) through their own operational improvements.

8. Information Security and Data Protection

Suppliers shall:

- a. Protect any personal data and confidential business information they process on behalf of Goldair Cargo S.A. or its customers.
- b. Comply with the GDPR and all other applicable data protection legislation.
- c. Implement appropriate technical and organizational measures to protect data, in line with the principles of ISO 27001.
- d. Report any data breach or information security incident affecting Goldair Cargo S.A. or its customers without undue delay.

9. Sub-suppliers and Supply Chain

Suppliers shall apply equivalent standards within their own supply chain and, in particular, ensure that their sub-suppliers comply with the principles of this Code. Goldair Cargo S.A. encourages suppliers to:

- Promote sustainability and ethical conduct throughout their value chain.
- Engage in continual improvement of their environmental and social performance.
- Adopt recognized standards and certifications (e.g. ISO 14001, ISO 45001, SEDEX/SMETA).

10. Monitoring and Compliance

Goldair Cargo S.A. evaluates supplier compliance with this Code through:

- a. Annual supplier evaluations under procedure ΔIAX.11 v.06 and E.ΔIAX.11.03 "Supplier Environmental Performance Evaluation".
- b. On-site visits and audits, where appropriate, particularly for critical service providers and transportation partners.
- c. Independent third-party audits (e.g. SEDEX/SMETA) where these are available.
- d. Ongoing dialogue, training and corrective action plans where deviations are identified.

Suppliers are expected to cooperate transparently with Goldair Cargo S.A. in the context of such evaluations and to remedy promptly any non-conformities identified.

11. Reporting Concerns

Suppliers, their employees and any other stakeholders may report concerns about possible breaches of this Code, of Greek or international law, or of ethical standards, through the Whistleblower Procedure of Goldair Cargo S.A. Reports may be submitted in confidence to the designated Receiving and Monitoring Officer (RMO), in accordance with Greek Law 4990/2022.

Goldair Cargo S.A. strictly prohibits any retaliation against persons reporting concerns in good faith.

12. Consequences of Non-Compliance

Breaches of this Code may result in:

- Requirement of corrective action plans within agreed timeframes.
- Re-evaluation of the supplier under the standard evaluation procedure.
- Suspension of further orders.
- Termination of the commercial relationship.
- Where applicable, notification to relevant authorities.

13. Closing

We believe that, in our effort to provide quality services in a socially and environmentally responsible manner, the active involvement and positive engagement of our suppliers is essential. By working together to uphold these standards, we contribute to a more sustainable, ethical and resilient supply chain.

We thank you for your cooperation and look forward to a long and mutually beneficial partnership.

Approved by:

Kallinikos Kallinikos



Vice President & Managing Director, Goldair Cargo S.A.

Date: December 2025