



## **Sustainable Procurement Policy**

*Athens, December 2025*

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## 1. Purpose

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Goldair Cargo S.A. recognizes that responsible procurement is essential to its sustainability performance and to the management of the environmental, social and economic impacts associated with the goods and services it sources and delivers.

This Policy establishes the principles, objectives and commitments that guide procurement decisions across the Company's warehousing, cargo handling, freight forwarding, logistics and transportation support activities, in alignment with ISO 14001:2015, ISO 45001:2018, ISO 27001:2022, the SEDEX/SMETA framework and the Greek National Climate Law 4936/2022.

This Policy applies to all procurement of goods, services, materials, equipment and subcontracted activities under the operational control of Goldair Cargo S.A., and to all employees and departments involved in supplier selection, evaluation and management.

## 2. Policy Commitments

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Goldair Cargo S.A. is committed to:

- Integrating environmental, social and ethical criteria into all procurement decisions and supplier evaluations.
- Promoting sustainability throughout the supply chain by communicating clear expectations to suppliers and contractors.
- Supporting suppliers with strong environmental and social practices, including those with recognized sustainability certifications.
- Reducing carbon emissions, energy consumption, waste generation and hazardous material use across the supply chain.
- Respecting human rights and avoiding any form of discrimination, child labour, forced labour or unfair treatment, in line with the SEDEX/SMETA framework.
- Encouraging local sourcing where this is consistent with operational, quality and economic requirements, in support of local economic development.
- Complying with all applicable legal, regulatory and contractual obligations relating to procurement, including labour, environmental, anti-corruption and data protection requirements.

## 3. Procurement Objectives

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In support of the above commitments, Goldair Cargo S.A. pursues the following procurement objectives:

- a. Comply with all applicable legislation and the requirements of relevant stakeholders.
- b. Promote sustainability awareness and good practice among suppliers and contractors, including transportation companies.
- c. Include sustainability criteria (environmental, social and governance) in all supplier evaluations conducted under procedure ΔΙΑΧ.11 v.06.

- d. Increase the proportion of suppliers holding recognized Corporate Social Responsibility, environmental or quality certifications.
- e. Reduce the percentage of hazardous raw materials and substances entering the supply chain.
- f. Increase the number of local suppliers where operationally and economically feasible.
- g. Achieve 100% signature of the Suppliers Code of Conduct by targeted suppliers and ensure that 100% of standard contracts include environmental, labour and human rights clauses.

#### 4. Selection and Evaluation Criteria

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Sustainability criteria applied during supplier selection, evaluation and ongoing performance review include:

- Carbon emissions reduction performance and climate-related commitments.
- Energy management and efficiency practices.
- Supply chain management and continuity capabilities.
- Waste minimisation and responsible disposal management.
- Respect for human rights, including prevention of discrimination and protection of vulnerable groups.
- Occupational health and safety practices.
- Compliance with anti-corruption, anti-bribery and ethical business standards.
- Data protection and information security practices, in line with ISO 27001:2022 requirements.

#### 5. Supplier Engagement and Monitoring

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Goldair Cargo S.A. engages with its suppliers through:

- a. Communication of the Suppliers Code of Conduct at the start of every commercial relationship and at every revision.
- b. Annual evaluation of suppliers in accordance with procedure ΔIAX.11 v.06, including a documented sustainability dimension under E.ΔIAX.11.03 "Supplier Environmental Performance Evaluation".
- c. On-site visits and audits where appropriate, particularly for critical service providers and subcontractors.
- d. Training and awareness activities for the Company's buyers and procurement staff on sustainable procurement principles.
- e. Corrective action plans for suppliers that do not meet the required standards.

#### 6. Targets and Commitments

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Goldair Cargo S.A. has established the following procurement-related targets:

- Maintain 100% signature of the Suppliers Code of Conduct by targeted suppliers (already achieved as at 2025).
- Maintain 100% inclusion of environmental, labour and human rights clauses in all standard contracts (already achieved as at 2025).
- Deliver annual sustainability awareness training to procurement and buyer staff.
- Conduct annual supplier evaluations covering all critical suppliers, with a minimum average score of 4,0 / 5,0.
- Progressively integrate carbon footprint and energy efficiency criteria into the selection of transportation subcontractors, in line with the Company's 30% carbon intensity reduction target by 2030 (against the verified 2022 baseline).

## 7. Monitoring, Reporting and Review

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Sustainable procurement performance is monitored through defined indicators, supplier evaluation records and internal audits. Results are reviewed during the annual Management Review and reported externally through the Company's annual Sustainability Report.

This Policy shall be reviewed at least annually, or sooner where significant operational, organizational, legal or regulatory changes occur.

## 8. Approval

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This Sustainable Procurement Policy is approved by Senior Management and communicated to all employees, suppliers, contractors and other relevant stakeholders. The Company is committed to providing the necessary resources to achieve the objectives established in this Policy and to drive continual improvement of its procurement practices.

**Approved by:**

Kallinikos Kallinikos



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

Date: December 2025