



CODE OF BUSINESS CONDUCT

2026



Metlen
Energy & Metals



Message from
the Chairman

Dear Colleagues,

METLEN Energy & Metals is today a global leader with a strong presence across all five continents. From our earliest steps to the present day, our journey has been one of steady progress, built on the hard work, consistency, and dedication of all our people. Thanks to your contribution, the Company has grown from a national champion into a global leader across all areas of our activity.

In recent years, significant milestones - such as our refreshed corporate identity, our listing on the London Stock Exchange, and our inclusion in the FTSE 100 - have further strengthened our position in the global business arena and opened new opportunities, reflecting the progress achieved through years of hard work.

These achievements are not only the outcome of strategic decisions but also a testament to our professionalism, integrity, and collective effort. At the same time, they serve as a reminder of our shared responsibility towards the Company, our colleagues, and society. The more we grow, the more vital it becomes to safeguard what we have worked so hard to build: the credibility, reputation and values that define METLEN.

In this context, the new Code of Business Conduct serves as an essential guide to how we work, collaborate, and progress together. It reinforces the principles, values, and standards of behaviour that must underpin every action and decision, regardless of position, role, or country of operation.

The Code applies to all METLEN employees without exception. It reminds us that how we achieve results is just as important as the results themselves. It is what safeguards our personal integrity and our corporate reputation, while strengthening the trust of partners, investors, and society as a whole.

Our commitment to ethics, transparency, respect, and compliance with the law is non-negotiable. We are all ambassadors of METLEN, demonstrating every day that business success can coexist with responsibility and respect for people, the environment, and society.

I invite you to study the Code carefully and apply it consistently and with pride. I encourage everyone to speak up, ask questions, and raise concerns. Transparency and dialogue are essential to maintaining the momentum that has brought us here and to ensuring continued progress that is both responsible and ethical.

I am deeply proud of what we have achieved and even more optimistic about what lies ahead. Together - with professionalism, integrity, and a collective spirit - we can continue to shape the future of METLEN, always upholding the highest standards of our values.

Evangelos Mytilineos
Executive Chairman of the BoD



Contents

1	Introduction	4
2	Our Vision	6
3	Management commitment to employees	8
4	The Role of Senior Executives and General Management	10
5	Sustainable Development	12
6	Principles of professional conduct	14
6.1	Business Ethics	15
6.2	Legal compliance	15
6.3	Conflict of Interest	16
6.4	Protection of assets	18
6.5	Integrity of financial, non-financial data and reports & management of records and digital systems	18
6.6	Safeguarding Confidential Information	20
6.7	IT Systems Security	21
6.8	Developing, deploying and using AI	22
6.9.1	Insider dealing	23
6.9.2	Energy markets (REMIT)	24
6.10	Healthy Competition	24
6.11	Personal Data Protection	26
6.12	Relations with the supply chain	26
6.13	Client relations	27
6.14	Shareholder & Investor Relations	27



6.15	Commitment against Bribery, Corruption & Fraud	28
6.16	Contacts with Pub. Authorities, Reg. Authorities & Public Interest Groups	30
6.17	Money laundering and terrorist financing	31
6.18	Sanctions and Export Controls	32
6.19	Respect for Human Rights	32
6.20	Diversity, Equal Opportunities & Inclusion	34
6.21	Workplace Harassment and Violence	35
6.22	Occupational Health & Safety	36
6.23	Protection of the Environment	37
6.24	Relations and Commitment Actions of Interested Parties	38
6.25	Public Affairs and Policy-Shaping Actions	39
6.26	Relations with Local Communities	39
6.27	Media Relations	41
7	Compliance with the Code	43
8	Reporting Code Violations	44
9	Management of Code Violations	46
10	Effect and Distribution of the Code	46
11	Personal Commitment and Acceptance of the Code	47
12	Definitions	49



1 Introduction →→

What is the Company's Code of Business Conduct?

The Code of Business Conduct sets out the overarching principles that define responsible business behaviour and the ethical standards expected of all employees of METLEN Energy & Metals PLC and its subsidiaries (hereinafter "METLEN" or "the Company"), as well as the commitments of the Company's Management towards its people.

The Code of Conduct sets out the standards of conduct expected of employees, but that further detail on particular standards expected within specific parts of the company's business can be found in specific policies and procedures, and that employees and partners should refer to those for more detailed guidance

It ensures that all Company activities are conducted with integrity, thereby safeguarding its reputation - its most valuable intangible asset - which, like any asset, must be protected. Furthermore, it establishes the necessary conditions for continued development and sustainable growth.

METLEN employees should be aware that:

- The Code is of critical importance to the Company, as adherence to its provisions is essential for achieving its primary strategic objective: continuous and responsible development.
- Its content sets out the standards of acceptable conduct for employees in their interactions with third parties - whether natural or legal persons, private or public entities, domestic or foreign - and extends beyond mere legal compliance in all areas of the Company's operations. This demonstrates the Company's unwavering commitment to act with integrity under all circumstances.
- The Code of Conduct is a guide to what is expected, but the provisions of specific legislative requirements in the countries where METLEN operates and its specific policies and procedures take precedence in the event that they conflict with anything set out in the Code of Conduct.



- The guiding principles behind the Code's creation include the nature of the Company's business activities, the applicable legislative framework, the high-quality products and services it delivers, and the professional and business conduct standards it has adopted as prerequisites for carrying out its operations.

Who does the Company's Code of Business Conduct apply to?

- The Code applies to and is binding upon all existing employees (**permanent and temporary employees, agency workers, self-employed contractors**) across the Company's Business Units and levels (**BoD, Directors, manager etc.**), as well as new recruits, who become subject to the Code and the Company's internal policies upon joining.
- It also applies to business partners and consultants who represent or act on behalf of the Company, in conjunction with METLEN's Suppliers and Business Partners Code of Conduct, whether through outsourced services or any other business activity.
- Companies in which METLEN holds an interest but does not exercise control are encouraged to adopt similar principles and standards of business ethics, where these are not already in place.

Why is the Company's Code of Business Conduct necessary?

The decisions we make and implement in the course of our work affect not only our colleagues but the Company as a whole. The Code is essential to ensure that all Company activities are carried out with transparency, honesty, and integrity.

Each of us, through our choices and actions, plays a vital role in upholding ethical business practices and values, improving our work environment, earning the trust of our clients, and strengthening METLEN's reputation.





2 

Our Vision

Inspired and motivated by our Greek heritage, we strive for global success.

Our Mission

To operate effectively in challenging local and international markets, demonstrating resourcefulness, efficiency, and respect for both the environment and society. To harness the potential of our people and create value for our clients, shareholders, employees, and the Greek economy.

Our Values

- **Effectiveness with Safety as a priority**
We rise to challenging situations and remain steadfast in achieving our objectives, while ensuring that safety at work is always our foremost concern.
- **Relentless Effort for Competitiveness Driven by Our People**
Our pursuit of competitiveness is continuous and relies on the expertise, skills, and dedication of our people, supported by ongoing investments in modernisation.
- **Respect and a Meaningful Role for Every Employee**
We respect every employee, foster the development of their abilities, maintain open communication, provide the resources they need, and empower them to fulfil their roles across the organisation.
- **Two success factors: Teamwork and Excellence**
Through teamwork, we achieve results that once seemed impossible. At the same time, we recognise and value individual excellence, ensuring it is channelled into effective action.
- **Continuous Progress in Everything We Do**
Continuous improvement is integral to our role and complements the execution of daily tasks. Every employee understands their responsibilities, contributes ideas for improvement, and receives recognition when those ideas are successfully implemented.



3

Management commitment to employees

METLEN Management acts with responsibility and consistency towards its employees. Investing in human capital is a cornerstone of our corporate culture, as it underpins the achievement of business objectives, the delivery of positive results, and the Company's ongoing growth.

In line with the above, Management:

- Commits to maintaining and continuously improving a safe working environment that fosters mutual trust, collaboration, and recognition.
- Promotes equal employment opportunities across all areas of the Company's activities, adopting recruitment practices fully aligned with the criteria and conditions set by applicable legislation. Ensures that selection procedures are based solely on merit, including abilities, skills, qualifications, educational background, and compliance with legal age requirements - regardless of race, colour, gender, sexual orientation, gender identity, ethnicity, nationality, religious or other beliefs, disability or chronic illness, neurodiversity, marital or socioeconomic status, age, political beliefs, or any other characteristic that may identify an individual as part of a vulnerable or minority group.
- Provides a workplace that fosters diversity and teamwork, achieving excellence by attracting and retaining individuals driven by knowledge and values.
- Complies with the applicable intellectual property laws.
- Protects employees' personal data, ensuring access only by authorised persons and solely where required by law and for purposes related to the employment relationship and the Company's business activities.
- Commits to maintaining a work environment free from any form of harassment, intimidation or discrimination.
- Encourages open communication and the respectful expression of opinions.
- The Company invests in modern human resources development systems, promoting creativity, growth, and the fulfilment of both personal and professional ambitions.



4 

The Role of Senior
Executives and General
Management



The Company's BoD and executives play a pivotal role in creating and sustaining a work environment that fosters integrity, collaboration, and trust.

The Human Resources General Division, in coordination with other senior management executives where necessary, ensures compliance with the principles of proper corporate and personal conduct throughout the organisation.

The role of executives involves:

- Fulfilling organisational and managerial responsibilities and assuming accountability for the employees under their supervision.
- Ensuring that the Code of Business Conduct is accessible to all employees, including new recruits, and that its principles are clearly understood.
- Promoting the standards and behaviours outlined in the Code by leading through example.
- Earning employees' respect by acting in an exemplary, honest, and socially responsible manner.
- Emphasising the importance of ethical behaviour and compliance, and applying these principles consistently in daily tasks.
- Monitoring legislative developments and proactively preventing breaches. Ensuring employees receive appropriate training and clear guidance to enable compliance with legislation and the Code.
- Creating an environment that encourages open expression of concerns, enhances psychological safety, and provides support for raising compliance issues effectively.
- Actively promoting equal opportunities, inclusion, and diversity, ensuring management practices are free from bias.
- Committing to continuous personal and professional development through participation in leadership, ethics, and sustainable management programmes

In some circumstances, the conduct of managers can lead directly to regulatory or criminal liability for METLEN entities.





5

Sustainable Development

METLEN integrates sustainable development into its operations, aiming to create long-term value for all stakeholders.

Oversight of sustainable development matters is carried out by the Sustainability Committee of the Board of Directors. As part of its role, the Committee reviews and ensures that the Group has appropriate strategies, policies and controls in place to operate in a responsible way. This includes reviewing performance against the Group's sustainable development strategy, as well as environmental, social and ethical matters.

The Committee receives regular updates and discusses sustainable development matters, based on information provided by the Group Corporate Governance and Sustainable Development Division. Where appropriate, these matters are reported to the Board of Directors for information and discussion.

At management level, the Group Corporate Governance and Sustainable Development function designs the Group's sustainable development strategy, ensuring alignment with the business strategy, and coordinates the Group's sustainability reporting in line with applicable regulatory requirements. It works closely with Sustainability Leaders and Ambassadors across the Group's business segments, subsidiaries and central functions, who are responsible for managing material sustainable development matters. Senior management of the Business Segments, key Subsidiaries and Central Functions has overall oversight of sustainable development matters within their respective areas of responsibility.

Our approach is grounded in transparency, accountability, respect for human rights, responsible environmental management, and business ethics.

The Company is committed to:

- Aligning its strategy with clear sustainability objectives, supported by robust governance and oversight structures.
- Collecting and documenting non-financial information through a dedicated digital platform, ensuring accuracy, completeness, and traceability. ([see 6.5](#))
- Providing reliable, complete, and timely information to independent ESG raters and rating agencies, thereby enhancing external transparency and objective performance reporting.
- Conducting annual Double Materiality Assessments (DMA) to evaluate both the Company's impact on the environment and society, and the sustainability risks and opportunities that may affect the Company itself. Ensuring active employee involvement in the full implementation and documentation of this process by providing accurate information and insights from their respective areas of responsibility.
- Promoting health and safety at work, as well as respect for and protection of human rights. ([see 6.19, 6.22](#))
- Ensuring environmental protection, reducing the Company's environmental footprint, and actively promoting circular economy principles. ([see 6.23](#))
- Maintaining an open and meaningful dialogue with Stakeholders and local communities, actively considering their expectations and feedback in the Company's decision-making processes. ([see 6.24, 6.26](#))





6

Principles of professional conduct

6.1 Business Ethics

The ethos of a business is founded on principles such as integrity, transparency, meritocracy, responsibility, and the way these principles are put into practice.

Business ethics go beyond mere compliance with legal, regulatory, professional, and industry standards. They embody, above all, the conduct of business activities in a spirit of fairness, integrity, honesty, and respect.



The Company's employees must be aware of the following:

Business Ethics is a fundamental prerequisite for any modern high-performing business such as METLEN. Employees play a vital role in fostering an environment where shared values are understood, appreciated, and embraced. This collective commitment strengthens the Company and supports its pursuit of long-term, sustainable growth.

6.2 Legal compliance

For METLEN, a fundamental and non-negotiable principle is that all business activities are conducted in full compliance with applicable laws and operational standards in every country and region where the Company operates.

As a founding member of the [UN Global Compact](#)¹, the Company ensures that its practices align with the ten internationally recognised Principles of the Compact.

Furthermore, under its Corporate Social Responsibility policy, the Company is committed to responsible, sustainable, and ethical business conduct. This commitment is regularly assessed against achieved results and includes continuous improvement of environmental and social performance, as well as transparency and corporate governance standards.



The Company's employees must be aware of the following:

- Any breach of the law exposes METLEN to risks whose scale and impact - both economic and social - can have severe and potentially incalculable consequences for the Company and, in some cases, for its employees.
- The Company considers it self-evident that all employees, regardless of their position within the hierarchy, must contribute to meeting legal requirements and comply with the procedures established by the Company to ensure this compliance.

6.3 Conflict of Interest

A conflict of interest arises when individuals must choose between the obligations of their role and their own private interests.

Accordingly, all Company employees - Executives, non-Executive personnel (including Department and Service Heads, Activity Managers), Administrative staff, and Technical personnel - are required, in the performance of their duties, to refrain from any activity, action or omission intended to pursue private financial interests or secure other personal gains, including those for members of their immediate or extended family.

The Company's employees must be aware of the following:

- They must not misuse their position within the Company for their own benefit or for the benefit of relatives or close associates.
- They are prohibited from using companies that conduct business with METLEN for personal purposes (such as placing orders or commissioning projects) if doing so would result in any personal advantage. This prohibition applies particularly to employees who have decision-making authority in the selection of business partners or who are in a position to influence such decisions.

- A conflict of interest may also arise in the following situations:

	When a METLEN employee provides services to a business partner (client or supplier) or offers assistance or services to a METLEN competitor.
	When an employee holds more than 5% of the shares in a METLEN competitor.
	When an employee engages in parallel employment during their free time that prevents them from fulfilling their duties to METLEN.

- Employees must inform their Line Manager, the Compliance Division, and the Human Resources General Division if they intend to join a committee of another company, a commercial entity, or a scientific advisory committee, or if they plan to engage in civic activities. Approval must be obtained for such involvement, and additional measures may be applied to prevent conflicts of interest.
- As it is not possible to provide an exhaustive list of all potential conflict of interest situations, employees are strongly encouraged to consult the Compliance Division or the Human Resources General Division whenever, in the course of their duties, they are required to act outside their usual responsibilities and have doubts about whether this could create a conflict of interest. Guidance should be sought to determine an appropriate solution.
- If, in the performance of their duties, they are required to take actions outside the established ones and for which they have doubts as to whether they give rise to a conflict of interest, in order to provide the right direction to find the appropriate solution.
- All employees must periodically, and according to their level of responsibility, declare any potential conflicts of interest through the Company's dedicated online platform. These declarations will be assessed by the Compliance Division.



6.4 Protection of assets

General Managers and Senior Executives are responsible for developing, establishing and managing appropriate policies to safeguard METLEN's assets.

The Company's employees must be aware of the following:

Employees must safeguard the Company's property, including both tangible and intangible assets, and all resources. They should exercise due care in their use, ensuring they are employed solely for legitimate work purposes, and make every effort to prevent waste, damage, destruction, or theft.

6.5 Integrity of financial, non-financial data and reports & management of records and digital

METLEN PLC and its subsidiaries (hereinafter 'METLEN') adhere to strict standards to ensure the accuracy, integrity, and completeness of all financial and non-financial data and reports, thereby promoting transparency and accountability in all relevant disclosures.

The Financial Statements are prepared and published in accordance with applicable Greek legislation, the International Financial Reporting Standards (IFRS) as adopted by the European Union, and the IFRS as adopted by the United Kingdom, on both a semi-annual and annual basis.

[Non-financial information](#)² is reported through the annual Sustainability Statement, which forms part of the Company's Consolidated Report, in compliance with the applicable regulatory framework. For the Company, this process serves as an important channel of dialogue with Stakeholders, fostering transparency, trust, and corporate accountability.

The Company's employees must be aware of the following:

- The Company's accounting records and supporting documents are structured to accurately represent the true nature of its transactions and to comply with applicable accounting standards.
- Accurate and reliable record-keeping is essential for the proper functioning of the Company. All information generated and used in the course of METLEN's activities must be maintained in the Company's records. Every record and book must be supported by the necessary documentation to verify the validity, accuracy, and completeness of the transactions recorded. Employees responsible for maintaining records must ensure their accuracy and completeness.
- Full and effective cooperation with both internal and external auditors is required. In the course of their duties, employees and executives must provide auditors with accurate and truthful information regarding METLEN's financial and non-financial assets.
- Non-financial data and information (such as environmental, social, and governance matters) are collected, documented, and monitored through the Company's dedicated digital platform.
- This data must be accurate, valid, and complete to ensure the reliability of annual reports and compliance with the regulatory framework.
- Employees involved in data provision are required to enter the information promptly and with due care, properly documenting sources and supporting evidence.
- This process promotes transparency and supports the Company's effective communication with designated sustainability auditors and, by extension, with stakeholders and investors.



6.6 Safeguarding Confidential Information

Confidential or proprietary information refers to data that has not been disclosed or is not publicly available. This includes financial and technical information, contracts, employees' and customers' personal data, plans for acquisitions or mergers, significant administrative changes, and any information relating to the Company's development and strategy.

In some circumstances, such information may also amount to "inside information" for the purposes of relevant market abuse legislation, which means that dealing in financial instruments based on that information could lead to criminal or regulatory enforcement action against individuals and/or METLEN entities.

Confidential information also includes data relating to copyrights, patents, business research, new product plans, strategic objectives, unpublished financial or non-financial data, pricing information, supplier lists, and details concerning requirements, business decisions, customer preferences, or plans.

In general, this covers any information that, if disclosed, could harm the Company legally or commercially. Employees who create or manage such information are responsible for its proper classification according to content and in line with the procedures of the Information Security Management System (ISMS).

The Company's employees must be aware of the following:

- In performing their duties and in any dealings with third parties, employees must not disclose or make available, in any form, the Company's confidential or proprietary information.
- They are required to safeguard such information, regardless of how or why it came to their knowledge, and must not share it with anyone outside the Company—including family members and friends—both during their employment and after its termination. Exceptions apply only where disclosure is required by law or necessary for operational purposes. Restrictions remain in force until the information is lawfully made public.

6.7 IT Systems Security

Protecting the security of information stored and transmitted through the Company's systems is a shared priority of the Information Technology & Security Departments and of every employee.

Management sets the security strategy, defines policies, and ensures best practices are implemented, taking all necessary measures to prevent security incidents and maintain confidentiality. These measures also ensure compliance with applicable regulatory and legislative requirements, while reducing operational risk.

All METLEN employees and contractors must adhere to the relevant policies, standards, and legal frameworks governing information security.

The Company's employees must be aware of the following:

- They are required to understand, align with, and strictly adhere to the Company's IT systems security policies.
- They must carefully review security updates issued by the IT Division and follow all instructions provided. If any guidance is unclear, they should promptly contact the IT Service Desk for clarification.
- Employees must remain vigilant about security issues on a daily basis and immediately report any suspicious activity (according to relevant information security policies and procedures) to the Cybersecurity Department or the Chief Information Security Officer. By doing so, they contribute to continuous security improvement and help create an environment that safeguards confidentiality and minimises the Company's exposure to risk.
- They are required to participate in relevant training and awareness programmes organised by the Company to ensure ongoing competence in information security.
- Employees should also be aware that any violation of the information systems security framework may result in disciplinary action, as permitted by law.



6.8 Developing, deploying and using AI

METLEN recognises both the significant potential and the serious responsibilities involved in integrating AI into its operations, products, and services. METLEN is subject to laws and regulations governing AI in some of the jurisdictions in which we operate.

Where AI models, systems and tools are developed, sourced, deployed and used, the Compliance Division establishes principles and controls to support our use of AI in accordance with applicable requirements. Where we use AI, we aim to embed ethical principles, such as:

Ethical integrity

Transparency

Accountability

Fairness and non-discrimination

Privacy and data protection

Safety and security

Sustainability

The Company's employees must be aware of the following:

- Before creating, installing, or using any AI system, the Compliance Division must be informed to ensure proper implementation and adherence to applicable regulations.
- Employees are strictly prohibited from uploading, transmitting, or sharing internal, confidential, or proprietary Company data with external AI tools, platforms, or services unless expressly authorised and fully compliant with approved corporate protocols.

The METLEN's AI Policy applies to:

- Developing an AI model
- Developing an AI system or tool
- Sourcing, installing or otherwise deploying any AI system or tool
- Using any AI system or tool, including uploading, transmitting or sharing internal, confidential or proprietary Company data or personal data while using any AI system or tool

6.9.1 Insider dealing

In accordance with the European Union and United Kingdom Market Abuse Regulation (MAR) and applicable national legislation, it is strictly prohibited to misuse inside information for personal benefit, attempt to misuse it, recommend that another person misuse it, or unlawfully disclose inside information.

This applies to anyone holding such information about METLEN or any other entity -such as a client, supplier, or partner of METLEN- where the relevant financial instruments are admitted to trading on a regulated market, multilateral trading facility (MTF) or organised trading facility (OTF), and/or where the information relates to instruments whose price or value depends on or has an effect on such instruments (including related derivatives).

Inside information' refers to information of a precise nature that has not been made public, which relates directly or indirectly to the Company and which, if made public, would be likely to have a significant effect on the price of the financial instruments concerned or on the price of related derivative instruments.

Examples of inside information include the creation of provisions for future profits or losses; developments relating to an imminent or proposed merger; an offer to acquire a company; the sale of significant fixed assets or a subsidiary; changes in dividend policy; issuance of new shares or bonds; changes in management; major operational improvements or difficulties; impending bankruptcy or financial distress; significant litigation; and the acquisition or loss of a key customer or supplier. Inside information can be either positive or negative.

Share dealing – what you must do:

- 1 Do not deal at any time if you have (or suspect you may have) inside information. This applies regardless of whether a “closed period” is in force.
- 2 If you are a restricted person (e.g. director/PDMR/specified employee), you must obtain written pre clearance before any dealing and follow METLEN's dealing procedures.
- 3 PDMRs are subject to additional restrictions, including a closed period before publication of annual or half year results, and must comply with transaction notification obligations (including for persons closely associated with them) as set out in METLEN's Share Dealing Code.
- 4 “Dealing” can include more than buying/selling shares (for example gifts, pledges, options/exercises and transactions carried out by investment managers on your behalf). See the Share Dealing Code for full definitions.

Insider dealing occurs when a person possesses inside information and uses it to acquire or dispose of financial instruments - directly or indirectly - for their own account or for the account of a third party.

Unlawful disclosure of inside information occurs when a person who possesses such information shares it with another person, unless the disclosure is made in the normal course of their employment, profession, or duties.



Market manipulation - consisting of actions that create false or misleading signals likely to influence the price of a financial instrument that can also arise through dissemination of false/misleading information - is strictly prohibited.

All obligations of METLEN and its employees under the Market Abuse Regulation (MAR), as well as the relevant provisions of the European Union, the United Kingdom, and Greece, are detailed in the respective policies available on the Company's intranet.

6.9.2 Energy markets (REMIT)

In addition, as a participant in the European energy markets, METLEN is required under Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (REMIT) to promptly disclose any inside information concerning the energy markets, prevent any form of market manipulation, and cooperate fully with the competent authorities in preventing and addressing abuse.

The alignment between MAR and REMIT ensures that the Company operates with transparency, integrity, and respect for market rules, safeguarding the interests of investors and society.

6.10 Healthy Competition

Healthy competition fosters the free development of markets and delivers social benefits. METLEN undertakes to ensure that:

Its activities are conducted within the framework of healthy competition and in strict compliance with all applicable laws in every country where it operates.

The Company's employees involved in the commercial activities, regardless of their position within the hierarchy, should be aware of the following:

- Employees must not engage in discussions with competitors regarding prices, costs, profit margins, capabilities, service availability, distribution channels, or any other strategic decisions that could influence METLEN's competitive position or encourage competitors to adopt similar strategies.

- They must not enter into any agreement with competitors (cartels) covering:

Market allocation (e.g., product distribution or service segmentation); client allocation (e.g., by size, sector, or other criteria, including geographical distribution);

Participation or non-participation in tenders or offers;

Submission of sham or coordinated bids intended to predetermine tender outcomes;

Actions aimed at excluding third-party competitors or restricting suppliers.

- They must not abuse any dominant position the Company may hold in the market, and are required to consult the Legal and Regulatory Division whenever the Company is in such a position.
- Obtaining or disclosing competitive information is strictly prohibited, no matter how this is done.
- Employees must engage in fair dealings with clients and suppliers, act based on merit, and always comply with the principles and rules of healthy and fair competition.
- They must not obstruct the work of the authorities during an unannounced on-site inspection. They should first verify the search warrant and immediately inform their Supervisor and the Legal and Regulatory Division.
- Breaches of competition law expose the Company to substantial financial penalties and reputational harm, which may have serious consequences for both the Company and the individual employee.



6.11 Personal Data Protection

- Failures to protect personal data can lead to real-world harm to individuals;
- Data protection and privacy laws apply in the jurisdictions in which METLEN operates, and violations of those requirements expose METLEN to significant penalties, civil action, and reputational damage / erosion of trust;
- METLEN's personal data protection policy/ies policies apply to all collection, use, disclosure, or other processing of personal data, including in respect of AI;

6.12 Relations with the supply chain³

Transparency in all transactions across the supply chain, at every level of METLEN's operations, is a fundamental and indispensable prerequisite for the Company's sustainable business growth. The Company ensures equal opportunities for all existing and prospective suppliers. Decisions regarding partnerships are based on objective criteria, including: the quality of the products and services provided, responsiveness and effectiveness of customer service, pricing policy, financial stability, reliability in the delivery of products and services, adherence to the principles of sustainable development (with particular emphasis on environmental, social and governance criteria), appropriate technological infrastructure aligned with the Company's requirements, as well as the supplier's experience and integrity.

METLEN is committed to avoiding the procurement of materials originating from active conflict zones (geographical area characterized by active, sustained armed hostilities) in the Ukraine, Middle East and Africa, at any stage of the supply chain.

The Company's employees must be aware of the following:

- The primary objective in managing METLEN's procurement activities is to secure reliable and uninterrupted sources of supply through a rigorous evaluation process that safeguards the Company's reputation.
- When engaging in transactions within the Company's supply chain, employees must inform existing or prospective suppliers and partners about METLEN's Suppliers and Business Partners Code of Conduct, available on www.metlen.com.
- METLEN conducts regular evaluation and monitoring of suppliers. Every employee is required to report any breaches or concerns immediately to their line manager or via the breach reporting line (Speak-up).
- It is an unequivocal and non-negotiable principle that the Company will take prompt and appropriate action upon discovering that a supplier or contractor is involved in illegal practices including investigating the matter, requiring remediation and corrective measures, and, where warranted, terminating the business relationship.

6.13 Client relations

METLEN's relations with its clients are founded on transparency, trust, respect, honesty, and integrity. By upholding these principles, the Company strengthens customer confidence and creates the conditions necessary for developing and maintaining long-term business relationships.

The Company's employees must be aware of the following:

- It is a fundamental commitment of the Company's Management - and, by extension, of all employees - to deliver high-quality products and services in compliance with applicable environmental, health and safety legislation governing their use.
- METLEN treats every client request or complaint with respect, promptness, and fairness. We actively encourage open communication and the continuous improvement of our services, taking into account client needs and suggestions. All actions are carried out in strict adherence to applicable laws and the Company's internal ethics policies.

6.14 Shareholder & Investor Relations

METLEN is committed to providing all necessary information and assistance to ensure the lawful exercise of Shareholders' rights, as well as delivering accurate and timely updates to financial analysts, institutional and non-institutional investors regarding its activities, operations, development, and strategic objectives.

METLEN's statutory control mechanisms and procedures safeguard transparency and integrity vis-à-vis shareholders and investors and strengthen their unwavering confidence in the Company.

The Company's employees must be aware of the following:

- The Company authorises specific individuals to communicate with the financial community.
- If employees receive questions and are not expressly authorised to respond, they must promptly forward the inquiry to the Company's Investor Relations General Division.



6.15 Commitment against Bribery, Corruption & Fraud

Compliance with laws against bribery corruption and fraud in all jurisdictions where the Company conducts business is mandatory. The Company subscribes and voluntarily adheres to Principle 10 of the UN Global Compact, which is based on zero tolerance for any form of corruption or bribery, as defined in the relevant [Convention of the United Nations](#)¹ and complies with all applicable local laws in the countries where it operates, including indicatively the UK Bribery Act 2010, the UK Fraud Act 2006 and the UK Economic Crime and Corporate Transparency Act 2023.

The Company's employees must be aware of the following:

- METLEN has zero tolerance for any form of fraud, bribery or corruption committed for the personal benefit of an employee or for the benefit of the Company.
- METLEN's Management is committed to maintaining transparency across the full spectrum of the Company's activities, including both financial and non-financial reporting.
- All employees must comply with the laws and the Company's procedures and internal policies.
- Every employee and business partner of the Company is personally responsible for the transparency of their actions.
- Their responsible conduct is based on their understanding, commitment and active contribution to the implementation of METLEN's Management Approach, as well as to the individual Anti-Corruption and anti-Bribery policies and practices in all Areas of its Business Activity.
- Employees and Business Partners (partners which perform services for or on behalf of METLEN and which therefore may fall within the definition of "associated persons" or "associate" for the purposes of the Bribery Act 2010

or the failure to prevent fraud provisions of the Economic Crime and Corporate Transparency Act 2023) must not offer or accept any form of benefit intended to secure an improper advantage that could influence a decision in favour of METLEN's interests: Indicatively, employees and their family members, as well as Business Partners, must not offer / accept gifts, discounts, benefits, or other considerations (financial or otherwise) to / from Company clients, vendors, public or other bodies, or any third party, where such items are directly or indirectly related to their role as employees of the Company, without prior written consent from their employer, except where these are acceptable under customary business practice.

In all cases, such benefits must be strictly for business purposes, appropriately moderate, and every effort must be made to preserve the integrity of the business relationship and avoid any conflict of interest or circumstances that could be perceived as bribery.

- METLEN has zero tolerance for any employee who makes threats of any kind or engages in extortion against any person. Extortion is the use or threat of force to compel a person to act or refrain from acting in relation to their duties, for personal gain. Conversely, the fact that an employee is subjected to extortion is not a justification for committing bribery. In case threats are made against any person within METLEN, such person should immediately inform METLEN's Security and Compliance Departments.
- Engaging third parties, such as consultants, agents, commission-based sellers, or partners in joint ventures (Business Partners), naturally entails a heightened risk of corruption and bribery for METLEN.

All employees entrusted with selecting and engaging such third parties should:

- ▶ Select third parties after a thorough integrity check in accordance with the relevant policy;
- ▶ Ensure that third parties are bound by appropriate anti-bribery and corruption contractual terms;
- ▶ Ensure that third parties understand the requirements and comply with METLEN's Suppliers and Business Partners Code of Conduct through ongoing communication and monitoring.

- In addition to any applicable legal penalties, any employee or business partner who engages in misconduct will be subject to disciplinary action for breach of their duties.



6.16 Contacts with Public Authorities, Regulatory Authorities & Public Interest Groups

Additionally to the above-mentioned rules against bribery corruption and fraud which also fully apply to the contacts with Public Authorities, Regulatory Authorities & Public Interest Groups, [the company's employees and Business Partners must be also aware of the following:](#)

- METLEN has zero tolerance for any form of bribery in the public sector (considered as both the offering promising or giving to, and the solicitation or acceptance from a [government official](#) ⁴, directly or indirectly, of an undue advantage, for the official himself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties): Bribery, [facilitation payments](#) ⁵, or any form of personal benefit to Government Officials is strictly prohibited.
- In any interaction with Government Officials, employees must follow the guidance of the Legal and Regulatory Affairs General Division, addressing any questions on a case-by-case basis and taking all necessary steps to ensure compliance with applicable laws and established practices.
- It is the METLEN's policy to make no donations whatsoever to political groupings or to persons related to them. Employees and Business Partners are prohibited from representing the Company, or appearing to act on its behalf, in any political activity in which they participate in their personal life.
- Cooperation with regulatory authorities, industry bodies, and public interest groups is an essential aspect of the METLEN's operations and must always be conducted in compliance with the law and in alignment with the Company's interests. All employees and Business Partners who, due to the nature of their work, interact with regulatory authorities, industry bodies and Government officials should adhere strictly to the guidance provided by the Legal and Regulatory General Division and the Compliance Division.

6.17 Money laundering and terrorist financing

Money laundering is the process of concealing or disguising the origin of proceeds from illegal activities, such as terrorism, drug trafficking, fraud, tax evasion, bribery, etc. This is typically achieved by channelling those funds into the banking system so that they appear to have been acquired legally.

Money laundering laws vary by country or region. In any case, it is important that METLEN only engages with clients, suppliers, consultants or third parties who have a good reputation, conduct legitimate business activities and maintain a lawful source of income in order to avoid any risk of involvement in money laundering and similar practices.

Company employees must:

- Not to engage in, or facilitate in any way -directly or indirectly- any actions related to money laundering or terrorist financing;
- Immediately report to their line manager, or through the speak-up line, any suspicious or unusual behaviour that may be associated with money laundering, as defined above;
- Strictly observe the procedures of the accounting department regarding payments and record-keeping, and exercise particular caution with cash transactions.



6.18 Sanctions and Export Control

METLEN fully complies with Sanctions and Export controls in all countries where it operates. Sanctions prohibit or restrict financial transactions and/or trade with certain governments, countries or territories, persons, entities, vessels, aircraft, and specific sectors of activity. They also may prohibit transactions with entities owned or controlled by designated persons.

Export controls cover the transfer of goods, services, systems, software, and know-how, including technology transfers by email, remote access, or even telephone conversations.

The Sanctions laws of multiple jurisdictions may apply to the business activities of METLEN and, in the absence of an appropriate license or authorization, no business shall be conducted with any individual, entity, vessel, aircraft, country, or territory subject to Sanctions unless METLEN has first ensured that such business complies with all applicable laws. All METLEN Employees and Contractors must ensure that the transactions in which they are involved on behalf of METLEN comply with all applicable Sanctions and Export Controls also considering, where appropriate, the end-user and/or end-use verification, and country-of-destination checks. Additionally, brokering, transit, re-export, and the provision of technical assistance, as well as "intangible" transfers of certain technology, are also in scope.

Compliance with Export Control legislation is critical, particularly when transactions involve countries, sectors or counterparties that are subject to restrictive measures. Any violation can result in severe administrative and criminal consequences for both the company and the individuals involved. Special care needs to be taken for dual use items (commercial parts of an equipment which may be used for military purposes)

All employees involved in engaging customers, vendors, contractors, subcontractors or other third parties, or in entering into transactions which involve imports and/or exports must strictly adhere to applicable Sanctions and Export Controls as well as relevant METLEN policies and procedures.



6.19 Respect for Human Rights

METLEN fosters working relationships based on mutual trust, constructive cooperation, two-way communication, and recognition, while taking into account the fundamental principles of the International Labour Organization (ILO) Declaration on Fundamental Labour Rights, as well as the UN Guiding Principles on Business and Human Rights⁷, the International Bill of [Human Rights](#)⁶, and the OECD Guidelines for Multinational Enterprises.

The Company is committed to:

- Ensuring health and safety at work through continuous risk prevention and improvement of working conditions, with the ultimate goal of eliminating accidents and occupational diseases;
- Establishing fair, decent, and sustainable working conditions, while respecting work-life balance;
- The complete prohibition of child labour and to implementing a zero-tolerance policy toward all forms of exploitation of minors;
- Preventing all forms of [forced labour](#)² or trafficking in human beings. At METLEN, we are committed to upholding dignity, respect and freedom from exploitation as fundamental rights of all individuals. This commitment drives us to assess risks, seek to prevent, detect and combat modern slavery in our business and supply chains;
- Promote equal opportunities and prohibit any form of discrimination or harassment, regardless of gender, origin, beliefs or other personal characteristics;
- Respect freedom of association and the right to collective bargaining, without fear of reprisal or restrictions;
- Implement fair and consistent disciplinary procedures, respecting the rights and dignity of employees;
- Respect the rights of local communities through consultation and cooperation, with the aim of preventing or mitigating negative impacts;
- Protect the right of access to clean water and sanitation, as well as the sustainable management of water resources;
- Comply with safety, quality and privacy standards in product management, ensuring transparency and accountability throughout the value chain;
- Work with security companies that adhere to international human rights standards and properly training staff in the rules of good and lawful conduct.



Company employees must:

- Carry out their duties with respect for human dignity and the fundamental rights of all individuals;
- Avoid any form of offensive, harassing or discriminatory behaviour in the workplace or in company partnerships;
- Contribute to maintaining an environment of trust and integrity, where everyone is treated fairly and with respect;
- Be aware that METLEN has reporting mechanisms in place to ensure the protection of those who report incidents in good faith.

6.20 Diversity, Equal Opportunities & Inclusion

METLEN actively promotes diversity, equal opportunities and inclusion as fundamental values of its corporate culture, recognising that people's diversity enhances innovation, collaboration and business performance.

The Company is committed to:

- The fair treatment of all employees, regardless of personal non-work-related characteristics, such as: race, colour, gender, sexual orientation, gender identity, ethnicity, citizenship, religious or other beliefs, disability or chronic illness, neurodiversity, marital or socioeconomic status, age, political beliefs, or any other characteristic that may classify an individual as part of a vulnerable or minority group;
- Implementing fair and inclusive processes for recruitment, integration, development, and growth;
- The use of inclusive language in all corporate communications, avoiding stereotypes and prejudices;
- The enhancement of gender equality at all hierarchical levels, with clear gender representation objectives;

- Raising awareness and providing training on unconscious bias, as well as on the principles of diversity, equal opportunities, and inclusion;
- Cultivating a sense of belonging by fostering trust, participation and authentic expression in the workplace.

The Company's employees must be aware of the following:

- The Company implements policies and practices that actively promote diversity, equal opportunities and inclusion at all levels.
- Their participation in training programs on these topics strengthens collective understanding and fosters a corporate culture of respect and cooperation.
- METLEN encourages openness, authenticity and dialogue so that every voice is heard and taken into account.
- Reporting mechanisms are available for incidents of exclusion or discrimination, ensuring protection for those who act in good faith.
- The active contribution of everyone to promoting an inclusive environment is a shared responsibility of each employee.

6.21 Workplace Harassment and Violence

The Company applies a Policy to Prevent and Combat Violence and Harassment in the Workplace, in accordance with Law 4808/2021 and applicable laws in other jurisdictions, with the aim of ensuring a work environment free from any form of violence, harassment, or discrimination.

The Policy applies broadly to all employees and partners of the Company, regardless of their employment relationship—active or inactive—as well as to prospective employees, trainees, and individuals employed through third-party service providers.

The Company upholds a zero-tolerance principle, provides training and information to prevent and recognise such behaviours, conducts risk assessments, and has established internal reporting and investigation procedures that respect confidentiality, human dignity, and personal data protection.

Affected individuals have the right to report incidents through designated channels, including telephone, email, or the corporate platform.

The Company ensures protection from retaliation, examines each report in a fair and objective manner and takes appropriate measures where necessary.



6.22 Occupational Health & Safety

Protecting health and safety across all business areas of the Company is a top priority. Achieving a zero-accident rate in the workplace, especially in the Company's production plants, is everyone's responsibility and goal.

Management ensures that the Company's activities are conducted in compliance with applicable laws and regulations, international and corporate standards, as well as good health and safety practices. All preventive and practical measures necessary to ensure a safe and healthy work environment are implemented, with the aim of preventing workplace accidents and occupational diseases, while eliminating or minimizing risks.

The company applies an Occupational Health & Safety management system, in accordance with the international standard ISO 45001, certified by an independent organisation, across its Business units. At the same time, METLEN employees and contractors must comply with the law and the relevant policies and standards, as set out in the Health and Safety Manuals and Procedures. Health and safety is everyone's responsibility, and the conscious commitment of each of us ensures continuous improvement of our performance.

The Company's employees must be aware of the following:

- Their responsible behaviour is based on an understanding of METLEN's Management Approach to Occupational Health and Safety, available in the Sustainable Development Report on the Company's website www.metlen.com, as well as on their commitment to implementing the individual Health and Safety policies defined by their respective business units.
- They are personally responsible for implementing workplace health and safety measures to the fullest extent possible, based on their duties, knowledge, skills, and experience.
- They must ensure the safety of their colleagues and visitors within their workplaces.
- They are committed to using the Personal Protective Equipment provided to them according to the nature of their work.

- They are encouraged to voice their concerns and identify areas within their work (unsafe conditions and behaviours) that require improvement in these matters, thereby continuously contributing to a better and safer working environment. The timely reporting by employees of accidents and hazardous situations constitutes a cornerstone for safety and prevention in the workplace.
- They are required to participate in training and information programs organised by the company for the continuous improvement of their performance in matters of Safety.

6.23 Protection of the Environment

The Company's business strategy is inextricably linked to sustainable development and the management of natural resources, introducing circular economy initiatives on a long-term basis. In this context, METLEN systematically implements practices to achieve the continuous improvement of its environmental performance. The Company's commitment and objective is for its processes, services, and products to have the minimal negative environmental impact in proportion to its business activity.

Consequently, the prevention of pollution, the mitigation of the impacts of Climate Change and adaptation to it, the sustainable management of natural resources, as well as the protection of biodiversity and the natural environment constitute integral elements of all Business Units

Compliance with environmental legislation constitutes a fundamental priority of the Company. This position is primarily based both on the principle of compliance with legal requirements and on the Company's Management's sensitivity to environmental matters, as well as on the agreements and commitments undertaken by the Company, including the acquisition and maintenance of all permits required for its business activity. In this direction, the compliance with applicable environmental legislation constitutes a key component both for the legitimisation and for the social acceptance of the operation of METLEN.

The Company implements an Environmental Management System in accordance with the international standard ISO 14001, certified by an independent body, across all Business Units of its operations. Finally, the Company promotes active and productive collaboration with the local communities in which it operates, aiming to share information regarding its environmental policy and programs, while continuing to cooperate with local communities as well as with any other entity that shares its commitment to environmental protection and the prosperity of future generations.

The Company's employees must be aware of the following:

- Their responsible conduct lies in the understanding of METLEN's Management Approach to Environmental Management and Climate Change, which is available through the Sustainability Report on the Company's website www.metlen.com, as well as in their commitment, within the scope of their responsibilities, to the specific environmental policies as defined by the Business Units to which they belong.
- They are encouraged to contribute by submitting their proposals and ideas, as well as by identifying and reporting areas requiring improvement on environmental matters, thereby actively participating in the reduction of the Company's environmental footprint. The timely reporting of situations that affect the environment by employees constitutes a key element for ensuring environmental protection and the continuous improvement of the Company.
- They must participate in training and information programs organised by the Company for their further awareness in the management of environmental matters.

6.24 Relations and Commitment Actions of Interested Parties

At METLEN, we believe that effective collaboration with our Interested Parties and social partners is essential for our sustainable business trajectory and our long-term success. For this reason, we are committed to identifying and collaborating with all Interested Parties in a transparent and fair manner, guided by our core principles of integrity and accountability.

The Company's employees must be aware of the following:

- They must inform and consult the Corporate Affairs Division (CAD) before collaborating with external Interested Parties and social partners.
- They must ensure that all communication material used in consultation with Interested Parties has the appropriate internal approvals from the Corporate Affairs & Communications General Division.

- They are required to immediately report to the Corporate Affairs Division (CAD) or to their supervisor any potential conflict of interest with any Interested Party.

6.25 Public Affairs and Policy-Shaping Actions

METLEN recognizes that transparent and responsible collaboration with governments, public authorities, and collective organisations is essential both for effective business activity and for sound governance.

The Company's employees must be aware of the following:

- All representations on behalf of METLEN are carried out solely by authorised executives.
- They must thoroughly examine METLEN's potential participation in trade and industrial associations and ensure that any such participation aligns with the Company's values and sustainability commitments.

6.26 Relations with Local Communities

Since its establishment to the present day, METLEN's history has been intertwined with the prosperity and development of local communities. Our commitment to these communities is based on deep respect for human rights, cultural diversity, and dedication to promoting sustainable socio-economic development across all regions, with a primary focus on the communities in which we operate.

We believe that long-term business success is inseparable from the prosperity and resilience of local communities. Therefore, METLEN maintains open, structured, and transparent frameworks for fair dialogue and grievance mechanisms, ensuring two-way communication, mutual understanding, and trust with local stakeholders



We are equally committed to transparency and strong governance in all support provided to communities, ensuring that our overall contribution is meaningful, responsible, and aligned with the needs of each community. This is a continuously evolving process that takes various forms, and is based on METLEN's ongoing effort to understand and respond to the concerns of local communities through the open social dialogue procedures it implements, as well as to build relationships that deliver multiple benefits, create added value, and strengthen social cohesion.

Company employees must:

- Build constructive relationships with communities, always respecting their specific cultural, social, and environmental principles.
- Take all necessary actions to identify, prevent, eliminate, and report any form of human rights violation, ensuring dignity, justice, equality, and well-being for all.
- Monitor the actual impacts and assess the potential impacts of our activities on local communities and on society at large, taking measures to prevent them or, where prevention is not feasible, to mitigate them. Seek feedback from local Interested Parties regarding our activities and ensure the effective operation of response mechanisms and the responsible management of their complaints.
- Promote cooperation with local authorities, educational institutions, NGOs, and other organisations for the joint development of actions that serve local priorities, as well as METLEN's participation in initiatives and activities through which it can support charitable giving, volunteering, community engagement, and the provision of assistance to specific [vulnerable social groups](#)⁸ or to citizens and communities in cases of emergency (e.g., natural disasters, etc.). Each such action must be implemented with full transparency, always in accordance with legislation and internal policies for combating financial crime (bribery, money laundering, tax evasion, etc.).

- In line with the alignment of METLEN's social policy with the United Nations Sustainable Development Goals, they must ensure that our projects deliver local benefits and promote targeted actions and initiatives that contribute to efforts for:

- ▶ Development and modernisation of local infrastructure
- ▶ Support for quality education and skills training
- ▶ Environmental protection and promotion of the principles of the circular economy
- ▶ Strengthening local employment and entrepreneurship
- ▶ Poverty and inequality alleviation
- ▶ Improvement of access to healthcare and social support services
- ▶ Promotion of culture and sports
- ▶ Promotion of the well-being of each community

6.27 Media Relations

METLEN's reputation is based - among other things - on clear, accurate, and responsible communication through every Communication and Information channel. Transparent and consistent communication is essential for maintaining the trust of the Interested Parties and safeguarding the Company's integrity.

All official communication with the Mass Media and Information—interviews, statements, speeches, public addresses, participation in public events, conferences—must be carried out in coordination with the Communication Division of the Corporate Affairs & Communication General Division.

Employees are expected to act responsibly in every form of public communication, including digital and social media, adhering to the following principles:

- Only authorised persons, designated by the Company, may represent the Company or speak on its behalf.
- Questions and requests from the Mass Media and journalists concerning METLEN or its activities, as well as any other information requests, must be addressed to the Communication Division.



- Prior to any public statement, speech, presentation, participation in a panel, conference, or interview related to their role or expertise at METLEN, employees must first obtain approval from the Communication Division.
- Employees must inform the Communication Division in advance when they intend to participate in public events related to their personal interests or experiences, but which may be indirectly associated with the Company.
- In the event that the following actions are accompanied by commercial requests, such as sponsorship support, they must be forwarded to the Corporate Affairs & Communication General Division for evaluation.
- Any advertising request they receive must be forwarded to the Communication Division for appropriate handling.
- Employees must communicate with respect and responsibility on Social Media, recognizing that personal opinions may be perceived as positions of METLEN.

Through responsible, well-coordinated, and transparent communication, we strengthen METLEN's credibility and the trust shown to us by business partners and society as a whole.



7

Compliance with the Code

METLEN is responsible for the implementation of the Code.

General Managers, Directors, Supervisors, and Activity Managers have increased responsibility for ensuring compliance with the Code.

If any Executive, Supervisor, or Department Manager or Activity Manager is aware that an employee intends to commit a prohibited act and fails to take measures to prevent it, they will be equally responsible as the employee.

It is the responsibility of all Company employees to:

- Read and understand the Code, seek guidance when required, and comply with the terms of the Code (or where there is a grey area because something isn't covered, its spirit).
- Refrain from behaviours that are contrary to the Principles of the Code and could harm METLEN's reputation.
- In the course of performing their duties and in their dealings with third parties, employees must bring the Code to their attention and, if required, indicate compliance with its rules.
- Consult their Supervisor or Director if they have any doubt as to whether an activity may be considered a violation of the Code.
- Ignorance of the provisions of the Code on the part of the employee is not excused and does not exempt them from the obligation to comply with these provisions.

Reporting Code Violations

METLEN expects its employees to report serious violations of Conduct when they become aware of them or when such violations are brought to their attention. Such action will enable the Company to address and resolve the issue ideally before it results in a violation of the law, a risk to health and safety, or jeopardizes its reputation.

In the event of Code violations, the Company's competent bodies carefully investigate the relevant reports while maintaining the confidentiality of the information, unless otherwise required by law.

The Company's employees must be aware of the following:

- They are encouraged to freely disclose if they become aware of any activity that deviates from the principles of the Code and may be a cause for concern.
- Such reports play a decisive role in avoiding or mitigating potential negative impact on the Company, while at the same time supporting a culture of transparency, responsibility, and integrity. Reporting persons have the right to submit reports, at their discretion, either anonymously or by voluntarily stating their name. The use of METLEN's reporting platform, even on an anonymous basis, enables direct communication with the employee for the provision of clarifications and additional information during the process of reviewing the report.
- The Company's Management ensures that no action will be taken against any employee who, in good faith, reports any actual or alleged inappropriate conduct.
- The reporting process should not be misused for reckless accusations or personal complaints. To prevent malicious or unfounded reports, sanctions may be imposed on employees who acted in bad faith. In such cases, the law on defamation is applicable in the countries where the Company operates.

Reports may be submitted through one of the following channels:

- 1 METLEN Speak Up reporting platform: Submit electronic reports from your computer or mobile phone at <https://METLEN.ethics.help>. The reporting platform allows the submission of Speak Up reports to METLEN in complete confidentiality and anonymity, using a predefined format and workflow. The platform is managed by an external service provider, and there is no way for METLEN to learn the identity of the reporting persons unless they voluntarily choose to disclose their name.
- 2 Email to METLEN@ethics.email: You can send an email with details regarding the suspected misconduct to this address from your METLEN account or from your personal account. If you do not disclose your identity in the body of the email, METLEN will not be able to see your email address, as the external provider conceals this information.

After submitting the report, reporting persons receive an automated acknowledgment of receipt along with instructions on how they can monitor the progress of their report. Both of the above options support two-way anonymous communication between the reporting person and the appointed officer responsible for handling METLEN reports.

In certain cases, additional reporting channels (for example, telephone hotlines) may be introduced by subsidiary companies in accordance with local policies, which must be approved by METLEN's Compliance Director. Regardless of any additional local reporting channels, Speak Up reports are submitted collectively to METLEN's central Speak Up reporting platform.

Further information is available in the METLEN's Speak Up policy or may be requested by sending an email to metlen@ethics.email (which will be received anonymously) or to compliance@metlen.com (with disclosure of the sender's identity to a representative of the Compliance Division).



Management of Code Violations

The management of Code violations is carried out by the Disciplinary Committee following a recommendation from the immediate supervisor or the body responsible for investigating the violation, as defined in the relevant policies and the applicable Employment Rules.

Omission of details from the Code of Conduct does not mean that METLEN endorses or condones any particular type of behaviour. If anyone is uncertain on any part of the Code, they should immediately seek guidance from their line manager or/and Compliance Division

Employees of the Company must be aware that non-compliance with the rules of the Code is considered a misconduct and, in accordance with applicable laws and regulations, may subject the employee—regardless of hierarchical level and depending on the severity of the violation—to disciplinary sanctions in line with the applicable legislation, the employment rules, and corporate procedures.

Effect and Distribution of the Code

It is the responsibility of the Company to ensure that the principles incorporated in this Code are communicated, understood, and adhered to by all employees. Compliance with the Code is monitored regularly. For its proper implementation, as well as for the further revision and validation of the Code, all competent General Divisions/Divisions of the Business Units and Central Functions cooperate. The Code of Professional Conduct is approved by the Board of Directors of METLEN.

The Code is available to all employees of METLEN, including the Board of Directors. In addition to the internal procedures for promoting the Code implemented by the Company, including internal communications and specialised training on the contents of the Code, employees may obtain it either in printed form by contacting the Human Resources General Division or in electronic form from the Company's official website.

Finally, the Code is provided to all new employees upon joining the Company.

Personal Commitment and Acceptance of the Code

I hereby confirm that I have received a copy of the Code of Business Conduct of METLEN, that I have read it, that I understand it, and that I will comply with it. I acknowledge that any violation of this code of conduct may result to disciplinary actions.

If I become aware of a potential violation of the Code, I will report the violation in accordance with [paragraph 8 of the Code](#).

Date:

Employee's full name:

Employee's signature:

Definitions

1. UN Global Compact

A United Nations international initiative adopted in 2000. Participating businesses agree to voluntarily support 10 fundamental principles in four areas: a) protection of human rights, b) labour practices, c) environment, and d) prevention of corruption.

2. Non-financial information or sustainability information of the Company

Non-financial information or sustainability information of the Company is defined as the data concerning the Company's performance in Social, Environmental, and Governance matters that it manages. More specifically, they concern the information provided to all groups of the Company's Social Partners, both through the Integrated Annual Report and through other disclosures made available by the Company.

3. Supply Chain

A series of activities or business partners that provide products or services to the Company.

4. Government Official

A Government Official is any person holding a legislative, administrative, or judicial office, whether by appointment, election, or succession, or any person exercising a public function, including within public authorities or enterprises, or any employee or representative of a public, domestic, or international organisation, or a candidate for public office.

5. Facilitation payment

The term facilitation payment usually refers to cases when a small amount of money is offered by one person to another (e.g., to a public or private employee) in order to secure or expedite the performance of a routine or necessary action, which the person making the payment is lawfully entitled to receive.

6. Human Rights

These are ethical principles that establish specific standards of human behaviour and are usually protected as legal rights under national and international law. They are considered "commonly perceived inalienable fundamental rights that every individual is entitled to from the moment of birth, simply by virtue of being a human being." These include civil and political rights such as the right to life and liberty, freedom of

thought and expression, and equality before the law. Human rights also include economic, social, and cultural rights, such as the right to work, the right to health, the right to food, the right to housing, medical care, education, and the right to participate in culture.

7. Forced Labour

Any work or service that is required of an individual under the threat of penalty and for which the individual has not offered themselves voluntarily (ILO Convention No. 29, "Forced Labour Convention," 24). The most extreme examples are work under conditions of slavery, but debts can also be used as a means of keeping workers in a state of forced labour.

8. Vulnerable Social Groups

These are groups or subgroups of individuals with a particular physical, social, political, or economic condition or a characteristic that places the group at greater risk of being harmed, or of being severely harmed, by the social, economic, or environmental impacts arising from the operations of an organisation. Vulnerable groups may include children and youth, the elderly, persons with disabilities, refugees or returning refugees, households affected by HIV/AIDS, indigenous populations, and national minorities. Vulnerabilities and impacts may vary depending on gender.



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