



Business Partners' Code of Conduct
Athens International Airport S.A.

Date of entry into force: March 2024

Edition number: 0

Approval: By the Board Chief Officers of the Company

Recipients of the document: The document may be communicated to interested parties of the Company

TABLE OF CONTENTS

1.	Purpose and Scope	3
2.	Application of the Code.....	4
3.	Definitions and Abbreviations	4
4.	References	4
5.	Minimum Ethical Standards for Business Partners.....	5
5.1	Integrity, ethics and conduct	5
5.2	Business and tax integrity	5
5.3	Record keeping and documentation.....	5
5.4	Professional Conduct – Due Diligence	5
5.5	Confidentiality – Protection of Intellectual Property	6
5.6	Information security - Personal data protection.....	6
5.7	Procurement Policy & Values.....	6
5.8	Money laundering – Financial sanctions.....	6
6.	Conflict of Interest: Gifts, Benefits and Hospitality	7
6.1	Conflict of interest	7
6.2	Gifts, benefits and hospitality.....	7
7.	Corporate Governance	7
7.1	Risk assessment and management	8
7.2	Incident management	8
8.	Labour and Human Rights	8
8.1	Anti-discrimination	8
8.2	Anti-harassment	8
8.3	Human rights	8
8.4	Prevention of involuntary and underage labour.....	8
8.5	Working hours, wages and benefits	9
8.6	Freedom of association and collective bargaining	9
9.	Health and Safety	9
9.1	Workplace health and safety management.....	9
10.	Child Safety.....	9
10.1	Child safety management.....	9
11.	Environmental and Social Governance	10
11.1	Environmental impacts	10
11.2	Sustainability Reporting	10
12.	Airport Operations and Security	10
13.	Audits and Assesments	11
13.1	Certifications.....	11
14.	Communication with AIA.....	11

1. Purpose and Scope

Athens International Airport S.A. (AIA) is committed to ethical, sustainable, and socially responsible procurement and business partnerships, as endorsed by the Airport Development Agreement (ADA), ratified by Law 2338/1995 and amended by Law 4594/2019 and further by Law 5080/2024, as well as applicable legal framework as well as the UN Global Compact scheme, AIA being a participant thereto since 2008.

In this effort we align our policies, inter alia with the Global Sustainable Development Goals and we seek and endorse cooperation with Business Partners, who share the same ethical commitments and standards in governance and administration, as per their business activity.

We view our Business Partners, whether Airport community stakeholders, including, indicatively, ground handlers & PRM service providers, concessionaires of all forms and types of activity at the Airport, service providers, tenants, contractors, or Business Partners of goods and services, as partners and we care about the way they do business when providing goods and services or works, including construction works and services, to AIA.

The standards and requirements set out herein apply to all AIA Business Partners, engaged through AIA's Procurement Policy and Framework.

AIA issues this Code of Conduct for Business Partner (the Code) which describes the minimum expectations in the areas of integrity, corporate governance, and anti-corruption; ethics and business conduct; conflict of interest, benefits and hospitality; labour, equality, child safety and human rights; health and safety; environmental and resource management. This Code aims, among others, to ensure adherence to applicable laws and regulations and socially responsible best practices, thus optimizing AIA's supply and value chain as said term is defined under Union Law. In addition, Business Partners and their Key Persons (owners, legal representatives or directors) are required not to be sanctioned for reasons of national security, human rights violations or for participation in, or links to criminal or terrorist organizations.

Alignment with this Code is a prerequisite for participation in the selection process for new Business Partners. Business Partners to AIA are advised to review the Code and ensure that relevant areas of their business and supply chain meet these standards. The relevant Code Acceptance Form must be undersigned by the Key Person of each Business Partner.

Engaging with a Business Partner in business presumes the provision of sufficient proof by the prospective Business Partners that above standards are met and continue to be met by the Business Partner throughout the term of business with AIA. Additionally, Business Partners should ensure that any sub-contractors, assignees, or farther suppliers of goods or services engaged in the performance of the Business Partner's duties to AIA comply with the principles of the Code, as appropriate.

AIA reserves the right to perform compliance checks and audits, as further stipulated in the respective agreements, or terms of engagement.

This Code complements AIA's Code of Business Conduct and Code of Relations with Business Partners applied for the Company's personnel, thus ensuring a seamless and holistic ethical performance and accountability by all parties and persons engaged in AIA's business activities.

2. Application of the Code

AIA seeks to work with its Business Partners who meet and exceed minimum regulatory and ethical expectations, as outlined in this Code, and continuously strive to improve the standards of their business practices.

All Business Partners are expected to operate in due compliance with all laws, rules and regulations of the jurisdictions in which they do business. Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured, or services and/or works are performed.

The expectations outlined in this Code are not intended to supersede or alter the Business Partner's regulatory and contractual obligations. The Code introduces guidelines on business conduct and as such complement the respective agreements or terms of contracts signed between AIA and every individual Business Partner, being also enforceable thereunder. Business Partners should check their respective contracts, agreements, and purchase orders, as they may contain additional obligations, or higher standards than those set out in this Code.

AIA expects all existing and new Business Partners to commit to the Code and communicate its content to related entities, partners, suppliers and subcontractors, who support them in the performance of their contractual obligations to AIA, so that they are aware of, understand and comply with the Code.

The Code is available to all Business Partners via the corporate Website.

3. Definitions and Abbreviations

Term/ Abbreviation	Definition of Term/ Abbreviation
Business Partner	Natural or legal persons who enter into agreements with the Company as supplier of goods/ services/ works, ground handler, PRM service provider, concessionaire, contractor.
Company	The company under the name Athens International Airport S.A. (AIA) and the brand name "ATHENS INTERNATIONAL AIRPORT ELEFTHERIOS VENIZELOS"
HCAA	Means the Hellenic Civil Aviation Authority, being the State Authority overseeing all civil aviation operations in Greece
Key Persons	The Business Partner's authorized legal representative, director, signatory, or agent
Employees	Permanent and temporary staff of the Business Partner and its related entities, partners, suppliers and subcontractors
AIA's Representative	AIA's assigned contact(s) for the purposes of a tender, or contract

4. References

- Applicable Hellenic Legislation (indicatively Law 4403/2016 4548/2018, Law 4706/2020)
- The European Climate Law: regulation, (EU) 2021/1119 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999
- Taxonomy Regulation (EU) 2020/852 on the framework to facilitate sustainable investment
- Directive EU 2022/2464 (Corporate Sustainability Reporting Directive-CSR)
- Directives EU 2015/849 and 2018/843 on the prevention of money laundering and terrorism financing

- The OECD Guidance on Responsible Business Conduct, 2018
- Universal Declaration of Human Rights (UN OHCHR 1948)
- The UN Global Sustainable Development Goals 2015
- The UN "Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy Framework, 2011
- The UN Global Compact 2000
- The UN Framework Convention on Climate Change of 1994 to which the Union and the Member States are parties such as the Paris Agreement of 2016
- Declaration on Fundamental Principles and Rights at Work of the UN ILO (1998)
- UN Rio Declaration on Environment and Development (1992)
- UN Convention against Corruption (2003).

5. Minimum Ethical Standards for Business Partners

5.1 Integrity, ethics and conduct

AIA expects high standards of ethical conduct and compliance with all applicable laws. Business Partners are expected to be ethical in their business activities, including relationships, practices, resource sourcing and operations.

5.2 Business and tax integrity

Business Partners are expected to comply with all anti-bribery, anti-corruption, and anti-money laundering laws. Business Partners must not engage in, either directly or indirectly, fraudulent, corrupt, or collusive activities. Moreover, Business Partners should be able to demonstrate their good standing and conformity to applicable tax legislation, as may be requested by AIA in the course of a tender process, or other pre-contractual arrangement.

5.3 Record keeping and documentation

Business Partners are expected to maintain adequate records that accurately depict all financial transactions and information regarding their business activities, labour, health and safety and environmental practices in accordance with applicable laws and regulations, standards, and business practices. Disclosure of information is expected to be undertaken without falsification, or misrepresentation.

5.4 Professional Conduct – Due Diligence

Business Partners, as well as their assigned Counterparties, related entities and subcontractors, are expected to perform in a manner that is fair, professional and that will not bring AIA into disrepute or legal endangerment. Moreover, Business Partners are expected to communicate accurately to AIA any information, in connection with their business standing or activity, which would enable AIA to make a reasonable decision on any aspect of interaction with the Business Partner (during tender process and contract period). Any falsification of records, distortion or misrepresentation of information and practices by the Business Partners shall not be tolerated.

5.5 Confidentiality – Protection of Intellectual Property

Business Partners undertake to effectively protect any information provided thereto by AIA, at any stage of their business encounter, especially on financial, governance or business activities. Business Partners must not improperly use any private, confidential, or commercially sensitive information in its possession relating to or in connection with their dealings with AIA, as further stipulated in any written instrument between AIA and each Business Partner.

Business Partners are required to uphold intellectual property rights of AIA and/or any third party involved in the scope of the agreement, especially on goods or services offered by it. Business Partners must be the lawful owners of intellectual property in any such provision or have secured the respective consent of rightful intellectual property owners, prior to contract with AIA.

5.6 Information security - Personal data protection

Business Partners are responsible to empower their organizations with all pertinent measures to ensure the information security and resilience against potential information, or cyber malicious or accidental threats, as determined by applicable legal obligations, industry standards and respective contract provisions between AIA and each Business Partner.

In addition, Business Partners are accountable to comply with the applicable data privacy legislation, as further determined by the scope of any business engagement with AIA, being required to implement adequate technical and organizational measures to ensure data confidentiality, integrity and availability, protection from accidental loss, unauthorized access, or misuse, as well as empowerment of the rights of individuals involved in processing activities.

5.7 Procurement Policy & Values

AIA's Procurement Policy & Framework describes the behaviours that uphold AIA's values:

- Excellence - be diligent, innovative, and accountable.
- Respect - be considerate.
- Open Communication – be ethical, listen and negotiate with dignity and openness .
- Valuing Diversity - appreciate everyone's strengths.
- Wellbeing - care for ourselves, others and our environment

Business Partners are expected to respect these values in their dealings with AIA's representatives.

AIA's Procurement Policy and Framework is available to the public through the Corporate Website.

5.8 Money laundering – Financial sanctions

A wide variety of laws on the subject are in force in various countries or regions. It is important for AIA to enter business relations with reputable clients, Business Partners, consultants or third parties of a good reputation, not engaged in any illegal activity or not attempting to legalize, through their business dealings, the money sources usually obtained from illegal activities such as terrorism, drugs, fraud, tax evasion or bribery.

- AIA and its Business Partners should support and contribute to efforts to combat money laundering, identify risk of money laundering and other financial crimes, and apply measures to control such

risk.

- Business Partners and their Key Persons must not be subject to financial sanctions by any governmental or international body, including but not limited to trade barriers, asset freezes, financial restrictions, and other economic penalties. AIA reserves the right to perform periodic sanction investigations by authorised external entities to ensure that AIA's Business Partners remain free of sanctions during the duration of their engagement with AIA.
- Business Partners are required to provide solemn declarations of sanctions clearance at the tender stage, or prior to any business engagement with AIA, and may be requested to complete a relevant questionnaire.

6. Conflict of Interest: Gifts, Benefits and Hospitality

AIA believes that all business activities must be undertaken with impartiality and any conflict of interest should be timely addressed and managed.

6.1 Conflict of interest

In the interest of avoidance all circumstances of potential conflict of interest, Business Partners must:

- a) declare to AIA's representatives any situation that raises an actual, potential, or perceived conflict of interest related to or in connection with its dealings with AIA, as further stipulated in Procurement Policy and Framework (PL-PRC001) and
- b) avoid financial, business, or other relationships which may compromise the performance of their duties under their business arrangement with AIA. Under AIA's Procurement Policy and the Code of Relations with Business Partners, AIA's personnel are expected to avoid actual, perceived, and potential conflicts of interest wherever possible. Any conflicts of interest that cannot be avoided, are expected to be declared and managed appropriately.

6.2 Gifts, benefits and hospitality

As explicitly set out in the Code of Business Conduct and the Code of Relations with Business Partners, AIA personnel must:

- (a) conduct themselves with the highest standards of integrity, impartiality, and accountability; and
- (b) perform public duties without favouritism, bias or for personal gain.

The appropriate handling of offers of gifts, benefits and hospitality is critical to earning and sustaining public trust.

As such, Business Partners are expected not to:

- (a) offer AIA personnel gifts or benefits, either directly or indirectly, while offers of hospitality shall be limited to token offers of basic courtesy; or
- (b) take any action in order to entice or obtain any unfair or improper advantage.

7. Corporate Governance

Commitment to sound management administration, risk and control systems, are key to a reliable supply chain for AIA. Business Partners are expected to maintain sound administration processes, including policies and procedures addressing ethical governance principles, sustainable development, accountability, and continuous improvement.

7.1 Risk assessment and management

Business Partners should develop and maintain a process to identify, manage and control relevant risks associated with their operations. These include supply chain risks and risks relating to labour and human rights, health and safety, social and environmental practices, business ethics, and corporate governance.

7.2 Incident management

Business Partners should:

- (a) identify and assess potential critical incident, emergency situations and business continuity risks;
- (b) develop and implement emergency plans and response procedures that comply with regulatory provisions, minimise harm to life, environment, and property, while minimising disruption to business continuity.
- (c) comply with the Service Level requirements as defined in the relevant agreements with AIA, to ensure the Service and Goods delivery within AIA's desired targets.

8. Labour and Human Rights

AIA believes that all persons involved in its supply chain deserve to be treated with dignity and respect. Business Partners are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into their business.

8.1 Anti-discrimination

Subject to applicable laws, Business Partners are expected not to discriminate against any member of their personnel based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, in hiring and other employment practices.

8.2 Anti-harassment

Business Partners are expected to commit to a workplace free from workplace bullying, harassment, victimisation, and abuse. Business Partners are expected not to bully or threaten their employees with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual or psychological.

8.3 Human rights

Business Partners are expected to provide goods, services, and works in a manner consistent with applicable human rights obligations. Consistent with relevant modern slavery legislation, Business Partners are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

8.4 Prevention of involuntary and underage labour

Business Partners are expected to:

- (a) ensure that all work is undertaken without coercion.
- (b) not use any form of forced, bonded, or indentured labour; and
- (c) employ only persons who are the applicable minimum legal age.

All use of temporary and outsourced labour should be within the limits of the law. Business Partners are therefore expected to:

- (a) use all reasonable endeavours to ensure that the third-party recruitment agencies engaged, are compliant with the provisions of this Code and applicable law; and
- (b) be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

8.5 Working hours, wages and benefits

Business Partners must:

- (a) follow all applicable laws and regulations with respect to wages, working hours and personnel compensation insurance;
- (b) ensure that all employees receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- (c) pay wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. Overtime work is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

8.6 Freedom of association and collective bargaining

Business Partners are expected to freely allow personnel to associate with others, form and join industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation, or harassment.

9. Health and Safety

Personnel health, safety and well-being is important to AIA. Business Partners are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into their business.

9.1 Workplace health and safety management

Business Partners must comply with related applicable legislation and are expected to:

- (a) manage occupational health and safety hazards;
- (b) provide their employees with job-related training and consult with them in relation to the provision of information and training; and
- (c) provide their employees with any personal protection equipment that may be required by law when undertaking their duties.

10. Child Safety

Business Partners are expected to provide a work environment that prioritizes the safety of all children.

10.1 Child safety management

Business Partners must comply with all applicable laws relating to child safety and are expected to:

- (a) manage child safety risks;
- (b) promptly report to AIA, any child safety issues (including allegations of harm of a child) that have occurred under the scope of Agreement with AIA.

11. Environmental and Social Governance

AIA acknowledges the United Nations' Sustainable Development Goals (SDGs) and the Agenda 2030, contributing to the global sustainability effort, being firmly committed to promoting environmental responsibility to reduce its environmental impact and to promoting the sustainability of the natural resources which depend on its business activity. AIA expects Business Partners to play a key part in its efforts to meet these commitments, not only by implementing environmentally responsible practices but also by offering alternatives and suggestions.

To that end Business Partners are expected to minimize the environmental impact of their operations and maintain environmentally responsible policies and practices (e.g. reduction of use of natural resources, prevention of pollution, waste management, greenhouse emissions, environmental compliance and licensing).

11.1 Environmental impacts

Business Partners must comply with all applicable laws and regulations relating to environmental management and are expected to manage the environmental impact of their operations by:

- (a) ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- (b) maintaining policies and practices for the efficient use of energy, water, and natural resource consumption; and
- (c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

11.2 Sustainability Reporting

Business Partners, to the extent set out by the Corporate Sustainability Reporting Directive (CSRD), are required to adhere to the reporting provisions based on the concept of double materiality: Disclosure of information on how their business activities affect the planet and its people, and how their sustainability goals, measures and risks impact the financial health of the business.

To that effect Business Partners, further to their corporate good standing, are expected, to be able to demonstrate their compliance to environmental protection, social responsibility and treatment of employees, respect for human rights, anti-corruption and bribery, diversity on Company Boards (in terms of age, gender, educational and professional background).

Furthermore, to the extent that Business Partners are subject to the Taxonomy Regulation and its delegated acts, are expected to comply with public reporting requirements, demonstrating and facilitating decisions on investment tackling greenwashing.

12. Airport Operations and Security

AIA's Business Partners must at all times adhere to "Airport Operations Regulations" as issued or amended from time to time by AIA or HCAA relating to the use, maintenance and/ or operation of the Airport and have been communicated and acknowledged by them within the context of their business engagement with AIA.

13. Audits and Assessments

To ensure compliance with this Code and applicable laws, Business Partners are expected to:

- (a) perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors, as per the terms of their respective agreement or other engagement;
- (b) cooperate openly, honestly and timely with any AIA audit, assessment or review, as same may be requested from time to time, as to be further stipulated in the respective agreement or other arrangement between AIA and the Business Partner;
- (c) AIA expects its Business Partners to report any concerns regarding compliance with the Code as well as violations of the Code committed by AIA employees or by other third parties. Such reports should be addressed to AIA's dedicated whistleblowing channels, as set out in AIA's Corporate Website.

13.1 Certifications

AIA, to the extent relevant under the respective business engagement with each Business Partner, positively assesses the award of certifications according to international standards as regards process management, products and services, as evidence of sound performance, quality and adoption of sustainable and ethical practices.

14. Communication with AIA

Business Partners may contact the Company's authorized representatives for any query, or clarification related to the provisions of this Code.