



**Cepal Hellas**

**Financial Services S.A.**

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**Third Parties Code of Conduct**

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## 1. Introduction

Cepal Hellas Financial Services Single Member S.A. – Servicing of Receivables from Loans and Credits (hereinafter referred to as “the Company”) is committed to ethical business practices and operations across its entities and jurisdictions of operation. The Board of Directors and Senior Management of the Company apply a “zero-tolerance” approach to any incidents of misconduct or illegal activity, regardless of whether these incidents originate from employees of the Company or third parties that the Company cooperates with or is represented by. The Company is committed in maintaining the highest standards of integrity, transparency and responsibility across all its activities, in full compliance with all applicable laws and regulations.

The Third Parties Code of Conduct describes the fundamental expectations of the Company on integrity and ethical business practices from all the Third Parties the Company collaborates (i.e., customers, suppliers, sub-contractors, representatives, intermediaries, consultants, etc.). Any Third Party that engages with the Company must comply with all applicable laws and regulations, as well as the requirements and principles set throughout this Third Parties Code of Conduct. The Company will not tolerate any unethical behavior or practice from any Third Party such as forced labor, child labor, harassment, abuse, human trafficking, discrimination acts, breaches of laws and regulations, bribery, fraud, corruption, money laundering, tax evasion, violation of intellectual property, confidentiality breaches, insider trading etc.

## 2. How We Work Together

The Company mainly operates in Greece and is required to comply with all applicable laws and regulations. However, the Company may engage with Third Parties that operate in many countries around the world. As a Third Party, you may be required to comply with national and international laws and regulations in the jurisdictions that you operate, and must conduct your business activities by applying high integrity standards that encompass the following:

### **Preventing Acts of Misconduct**

You need to ensure that you are taking appropriate actions within your organization to prevent any acts of misconduct (i.e., corruption, extortion, embezzlement, fraud, bribery, money laundering, market abuse, sanctions, trade controls, collusive practices, etc.). Such acts can have a detrimental impact to the organization internally, but also impact other stakeholders such as customers (e.g., the Company) by impairing their reputation. All bribes of any kind (cash, cash equivalents, gifts, entertainment, internship, employment or even a promise) are strictly prohibited.

### **Avoiding Conflicts of Interest**

You need to be mindful of potential conflicts of interest when engaging with the Company. A conflict of interest occurs when a private or personal interest may adversely influence a business decision or a business need. These conflicts can impair the objectivity of a business decision transaction and potentially lead to unfair business practices. You must take

appropriate measures to ensure that either these conflicts are not present or if they are to be timely and appropriately disclosed to the Company. Cases of conflict of interest arise from significant relationships which include but are not limited to, parents, spouses, siblings, children.

### 3. Our Responsibility towards Each Other

The Company cultivates an environment of fair collaboration, mutual respect, and open communication with its Third Parties. In this environment, all parties are expected to abide by their commitments towards each other and interact with integrity throughout their collaboration. This is accomplished by:

#### **Protection of Information and Personal Data**

During your collaboration with the Company, you may be given access to confidential information as part of the business relationship. You should not share this information with anyone, without the expressed authorization of the Company. Respectively, you should not share with anyone at the Company any information that relates to any other company that you have a legal or contractual obligation not to do so. Certain engagements may require the exchange of personal information. For this purpose, you must ensure that the processing and storage of such information is conducted in compliance with the respective data privacy laws and regulations and an appropriate information security framework is implemented.

#### **Protection of Intellectual Property**

You must respect the intellectual property rights of the Company and other third parties and may not knowingly use the intellectual property of any third party without permission or legal right.

#### **Insider Trading**

You must not disclose material nonpublic information of the Company to other persons including family members.

#### **Respecting Free Competition**

You must ensure that you compete fairly in the market and do not engage in any practices with competitors or other parties to influence the market, share customers in the market, fix prices, manipulate the bidding process, boycott clients, other Third Parties. You must comply with free competition laws and take appropriate steps to ensure that any information collected for any entity is collected only from publicly available sources. The Company will not tolerate any acts of gathering information through illicit processes such as spying or stealing.

#### **Maintaining Accurate Financial and Non-Financial Records**

You must maintain and provide accurate records on all matters that relate to the business relationship with the Company or matters that are reported to any government body or authority. All the respective transactions must be recorded accurately and completely in the

corresponding accounting period that they relate, and all invoices must be sent to the Company timely and without delay, compliant with applicable law and financial standards

#### **Refraining from Acts of Influence (Gifts & Hospitality)**

The Company embraces different cultures and customs and recognizes that gift-giving and hospitality is an integral part of these different cultures and customs. Gift giving or taking, and hospitality must be transparent, modest, and reasonable. You should never offer or accept a gift or hospitality to anyone at the Company that can be or perceived to be an act of influence or an expectation to reciprocate. Expensive gifts and gifts of cash or cash equivalents are strictly prohibited. You are strongly advised to check with your Company contact before providing any gift.

## **4. Your Responsibility as a Corporate Citizen**

We all share a responsibility to engage and act with integrity towards our stakeholders, the communities that we operate and the environment. The Company expects from all its Third Parties to exercise this responsibility by:

#### **Respecting Human Rights & Labour Standards**

By adhering to the fundamental principles set forth by the United Nation's International Bill of Human Rights, the corresponding guidelines of the Organization for Economic Cooperation and Development (OECD) and the standards of the International Labour Organization (ILO). Everyone has the right to be treated equally, with dignity and utmost respect, to exercise their freedom, and be free from discrimination of any kind, intimidation, or harassment. The Company will not tolerate any of its Third Parties to engage in acts such as forced labor; child labor; human trafficking, abuse (verbal or physical), not allowing collective bargaining; and violation of labor rights. Also, Third parties must follow all applicable laws and regulations with respect to working hours and days of rest and must meet all legal requirements relating to wages and benefits.

#### **Health and Safety**

The Third Parties must obtain, keep current and comply with all required health and safety permits. They must also establish a process to identify and document foreseeable occupational health and safety hazards in the work environment and make efforts to manage relevant risks.

#### **Protecting the Environment**

By complying with environmental laws and regulations and taking appropriate measures to minimize the production of waste; avoid using hazardous substances when suitable alternatives are available; and prohibit any acts of pollution.

### **Engaging Responsibly with Communities**

By respecting cultures, adhering to local laws and regulations, and fulfilling commitments (i.e., pay taxes and social contributions) to the various communities that you operate. The Company recognizes the importance of giving back to the communities and encourages such activities by any Third Party that wishes to perform such action, as long as these actions are performed transparently and are charitable in nature, without an expectation of a benefit.

### **Prevent Acts of Money Laundering**

Third parties must not engage or assist others in concealing illicit funds or other suspicious activities,

## **5. Compliance with this Code, laws and regulations**

Third Parties shall comply with applicable local and international laws and regulations and are expected to comply with this Code. To the extent any applicable law or regulation is more restrictive than this Code, such law or regulation shall govern. Cepal expects Third Parties to implement policies, procedures and training, as deemed necessary by the Third Party, to comply with this Code.

## **6. Reporting Misconduct**

The Company expects from all the Third Parties to report any concerns or incidents of misconduct. Such reports can be submitted safely, confidentially and anonymously (if preferred) through the following communication channels:

- Website: Whistleblowing Platform “[Speak Up](#)”
- Cepal Hellas email: [whistleblowing@cepal.gr](mailto:whistleblowing@cepal.gr)
- Mail: Cepal Financial Services S.A, 209 – 211 Andrea Syggrou Avenue, Greece, Post Code 171 21, Nea Smyrni, Athens (please reference your letter towards the Whistleblowing Oversight Officer of Cepal)

For further details on how to report a concern or an incident, please see our [Whistleblowing Policy](#).

## **7. Questions about this Code**

If you have any questions about any provision of this Code please contact: Corporate Procurement Department at [CorporateProcurement@cepal.gr](mailto:CorporateProcurement@cepal.gr)