



BUSINESS PARTNER'S CODE OF CONDUCT

GROUP COMPLIANCE DIVISION

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FOREWORD

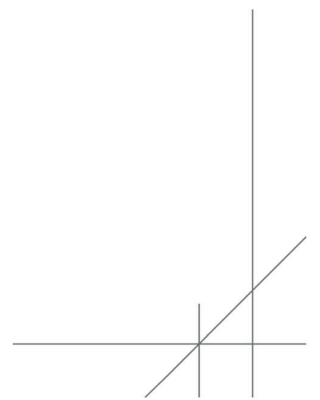
ELLAKTOR commits to conduct its business in compliance with all applicable laws and regulations, act upon the highest ethical standards and treat others with respect, according to the principles laid down in this Business Partner Code of Conduct (the Code).

This Code explains what ELLAKTOR expects from you as a Business Partner with regards to business ethics, human rights, employee relations, health and safety, personal data protection, and other topics related to sustainable and responsible business practices.

As our Business Partners, we expect you to adopt and comply with the ethical business standards and values set out in this Code, and to actively use such standards when dealing with your own subcontractors.

The Code of Conduct for Business Partners applies to any Third Party that engages in business dealings with ELLAKTOR, such as suppliers, subcontractors, customers, and anyone providing services to the Group companies or acting on behalf of the Group.

The purpose of the Code is not to replace existing policies of Business Partners but to serve as a guide regarding the principles and standards followed by ELLAKTOR, which the Company expects its Business Partners to adopt within the framework of their activities.



OUR COMMITMENT TO INTEGRITY

Act with integrity and respect in all business dealings

ELLAKTOR is committed to the highest standards of integrity across all its operations and condemns any acts of unethical business practices or unethical behavior from its Employees or Third Parties.

Having adopted the UN Strategic Development Goals of 2030, ELLAKTOR actively promotes the fundamental principles of these goals, as these are essential components in managing the challenges and opportunities of a rapidly changing global environment. ELLAKTOR cultivates an environment of fair collaboration, mutual respect and open communication with its Third Parties.

Business Partners, and all persons acting on their behalf, are expected to abide by their commitments and act with integrity, honesty and fairness in all aspects of their business. As an integral part of ELLAKTOR's supply chain value processes, all Third Parties are expected to have in place internal policies, procedures, training activities and controls that ensure ethical business practices and behavior across their business operations.

WORKING TOGETHER

ELLAKTOR operates in many countries around the world and engages with Third Parties that operate nationally or internationally. This requires ELLAKTOR to comply with various national and international laws and regulations.

ELLAKTOR's Business Partners are likewise expected to comply with the relevant national or international laws and regulations applicable to the jurisdictions in which they operate, upholding the highest standards of integrity, which include the following:

1. Ethical business practices

Maintaining Accurate Financial Records

We create and maintain accurate and complete records using recognized accounting standards and security measures. Keeping accurate books and records as well as declaring taxes and duties is part of running a lawful and transparent business in a sustainable way. ELLAKTOR expects its Business Partners to comply with all applicable laws and accounting rules in this respect.

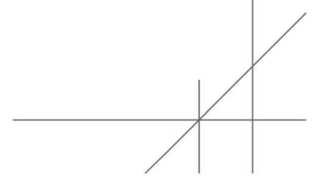
Refraining from Acts of Influence (Gifts and Hospitality)

ELLAKTOR 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. Gifts and hospitality must not be offered, or give the impression of being offered, as a means of obtaining or retaining an advantage, or to influence the outcome of business decisions. Expensive gifts and gifts of cash or cash equivalents are strictly prohibited.

Operating with Transparency

ELLAKTOR complies with all national regulations, laws, and international conventions aimed at combating corruption including money laundering and conducts business transparently. The direct or indirect offer, granting or acceptance of illegitimate benefits to generate, maintain or accelerate business is unacceptable.

Business Partners must ensure that no such benefits are exchanged in the course of their and their sub-contractors' businesses, following a zero-tolerance policy regarding such practices.



Avoiding Conflicts of Interest

Business Partners and persons acting on their behalf must avoid conflicts of interest with respect to their private activities, entities in which they or their close relatives or associates have an interest, and business activities with ELLAKTOR or other parties. A Business Partner must inform ELLAKTOR about any conflicts of interest as soon as they become aware of them.

Ensuring Fair Competition

ELLAKTOR complies with antitrust and competition laws and does not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e.g. regarding markets, customers, strategies, prices.

All Business Partners and all persons acting on their behalf are expected to participate in public tenders and private sector bidding procedures by strictly following the applicable laws and regulations.

Protecting Confidential Information

Business Partners may be given access to confidential information as part of the business relationship. This information should not be shared with anyone, without the expressed authorization of ELLAKTOR. In particular, the use or dissemination of non-public, privileged information is prohibited under securities law, including i. disclosing privileged information to another person, except where individuals are acting within the normal scope of their work, profession, or duties, ii. advising or encouraging another person, based on privileged information, to acquire or dispose of financial instruments to which that information relates. Permissible trading practices are defined by relevant Capital Market Commission decisions and applicable legislation.

Protecting Personal Data

The Group's approach to personal data management and to safeguarding the rights and freedoms of individuals, when their data is processed, is fully aligned with the General Data Protection Regulation (EU) 2016/679 (GDPR) and Greek Law 4624/2019, as applicable. Executives, staff, and other external collaborators or Third Parties working for or with the Group, who have access to personal data during the exercise of their responsibilities and duties, are required to comply with the Group's Data Protection Policy, available on the Company's website (<https://ellaktor.com/>).

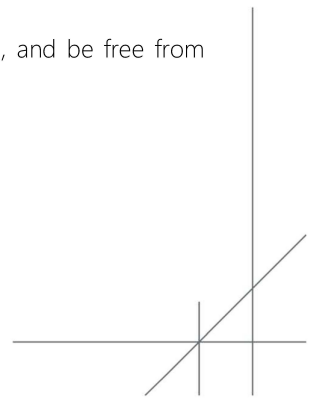
2. Promoting a Healthy and Safe Work Environment

We focus on maintaining a healthy and safe work environment for all employees, by effectively monitoring, preventing, reducing or removing any risks associated with the work our employees and supply chain undertake in support of our zero harm aims.

Business Partners must take the necessary protective measures to ensure a safe and healthy working environment for all their employees.

3. Respecting Human Rights and Labor Standards

Everyone has the right to be treated equally, with dignity and respect, to exercise their freedom, and be free from discrimination, intimidation, or harassment.



We adhere 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 Labor Organization (ILO).

ELLAKTOR expects its Business Partners to treat their employees, and all persons acting on their behalf, with the highest ethical standards and will not engage in acts such as: forced labor, child labor, any form of violence or harassment, any type of discrimination or unequal treatment, employee compensation beneath minimum wage, allowing collective bargaining, violation of labor rights, and excessive working hours.

4. Protecting the Environment

ELLAKTOR upholds its commitments to comply with environmental legislation and to maintain a comprehensive environmental management system with strategic priorities in climate change and the circular economy. ELLAKTOR's key commitments include environmental protection, including pollution prevention; ensuring the provision of required information and resources to achieve the objectives of the implemented Environmental & Energy Management Systems; consulting and engaging in open dialogue with stakeholders on environmental and energy matters; and continuously improving environmental and energy performance. Furthermore, ELLAKTOR seeks to contribute to the collective European goal of a successful and sustainable transition to a climate-neutral economy by 2050, to recognize the risks and opportunities of climate change, adapt to its impacts, and reduce its carbon footprint.

ELLAKTOR recognizes that acting in an environmentally responsible manner is essential and expects all its Business Partners to respect applicable legislation and encourages them to pursue initiatives to reduce their environmental footprint.

5. Engaging Responsibly with the Communities

We respect cultures, adhere to local laws and regulations, and fulfill our commitments (i.e. pay taxes and social contributions) to the various communities that we operate.

ELLAKTOR also recognizes the importance of giving back and encourages all its Business Partners to contribute to the various communities that they operate. Any such activities though, need to be performed transparently and be charitable in nature, without an expectation of reciprocation to any activity related directly or indirectly to ELLAKTOR.

RAISING CONCERNS OR REPORTING AN INCIDENT

Talk2Ellaktor

We expect everyone to report any concerns or issues regarding non-compliance with ELLAKTOR's Code of Ethics and Business Partner's Code of Conduct, laws, regulations and in general, any act or omission which could in any way harm ELLAKTOR or its reputation.

Even if you are in a situation that something just "doesn't feel right", you should always report your concern. All reports are treated confidentially and without any fear of any form of retaliation towards any person that in "good faith" reports a concern or a potential violation

Any information provided will be checked for plausibility by specifically trained persons who are obligated to confidentiality.

ELLAKTOR, in full compliance with the regulatory framework and with the aim of establishing an easily accessible reporting mechanism, provides the following communication channels, where reports can be submitted securely and conveniently:

- Via the Group's website, specifically through the dedicated electronic platform Talk2Ellaktor
- By telephone: +30 210 818 5005 (Mon - Fri, 10:00 - 15:00)



- By email: compliance@ellaktor.com
- By mail: Ellaktor Group, Ermou 25, 145 64, Nea Kifissia, Athens-Lamia National Road, Olympic Village Junction, Greece, marked "CONFIDENTIAL", addressed to the Head of Compliance.

MONITOR AND COMPLIANCE

ELLAKTOR will monitor compliance to the Code and reserves the right to investigate any reasonably suspected breach. It is the intention of ELLAKTOR to terminate its relationship with any Business Partner who does not comply with this Business Partner Code of Conduct or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.

REVIEW

The Code of Conduct is approved by the Chief Executive Officer and is reviewed whenever necessary. The Head of Compliance is responsible for preparing and proposing any revisions to the Code.

Under the responsibility of the Group Compliance Division, the Business Partner Code of Conduct is published in its updated version on the Group's website: www.ellaktor.com.

