

CODE OF CONDUCT
FOR SUPPLIERS CONTRACTORS
COLLABORATORS

JANUARY 2018

VERSION 1.0



VASSILIKO CEMENT WORKS
PUBLIC COMPANY LTD

Since 1963



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INTRODUCTION



Vassiliko Cement Works Public Company Ltd was established as a public Company in 1963, and started its operation in 1967.

Vassiliko Cement Works practices its business activity based on the fundamental principles of ongoing products improvement and provision of optimum services rendered to our clients, respecting at the same time environmental issues and principles. These principles are inextricably linked to the achievement of its strategic goals.

Our commitment to sustainable development is included in our mission and follows our priorities firmly, by adapting to changes, with new solutions and innovations, with no compromise to our values.

OUR VISION

Our vision is to excel as a Successful company, based on principles which at their core encompass Respect and Contribution.

OUR MISSION

Quality lies at the heart of our activity, and thereby addressing the challenge of continuous and innovative development will be part of our business-as-usual. Our commitment to respecting the environment, respecting and supporting our people and the local communities will be recognised through transparent and clearly demonstrated practices.



CODE

The Code explains the basic rules of behavior/ communication which are based on the Vision, the Mission and the Principles of Vassiliko Cement Works and represent the general frame, trying to protect the company's fame and guarantee its sustainable development. The present Code's content includes elements of the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work.

In this frame, the selection of Suppliers/ Contractors/ Collaborators and the creation of market terms must be done based on an objective and transparent evaluation, which, among others, bears in mind the ability to provide and secure an adequate level of service, but also compliance with the company's rules.

Our Company's Code applies in general to the direct and indirect Suppliers/ Contractors/ Collaborators concerning all categories. We realize that the circumstances under which our Suppliers/ Contractors/ Collaborators work may change, as also the legislation in Cyprus, and for this reason we will reexamine the Code every two years, to ensure that its content and application are always currently relevant and effective.

This Code is considered to be an inseparable part of the contracts/ agreements signed between the Company and Suppliers/ Contractors/ Collaborators.

A. LABOUR CONDITIONS & HUMAN RIGHTS

A.1. LABOUR CONDITIONS & HUMAN RIGHTS

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works attend to provide a working environment free from any kind of assault or ethical pressure and that the employees are treated with respect and dignity. Situations of inhumane treatment, sexual harassment, psychological blackmail and verbal bullying are not accepted.

A.2. No Discrimination

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works should not endorse discriminations of any kind against their employees involving race, gender, color, age, sexual preferences, nationality, disability, pregnancy, religion, political beliefs, participation in unions or family status.

A.3. No Child Labour

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works must not accept Child Labour that results in the exploitation of children, at their facilities or at other areas that may operate. Also, they should make sure that their project contracts with their partners (suppliers/ collaborators, etc.) explicitly prohibit Child Labour. They must strictly adhere to the limits of legal age for labour that are in place in Cyprus. No employee, of any age, including trainees or students that follow procedures of vocational training can work by violating the state rules that determine the minimum age limit for labour or the obligatory duration of school attendance, according to the existing Cypriot Law.

A.4. Working Hours, Salaries & Allowances

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works must be in a position to declare that they actually pay wage or salary equal or above the minimum limits set by law to every employee. The Suppliers/ Contractors/ Collaborators secure that the salaries paid for all the hours of work offered correspond at least to the legal minimum salary. They should also pay all the allowances that are obligatory according to law, as national holidays allowances, holidays allowances, annual leave, sick leave, etc.

The sum of working hours per week including overtimes must not exceed provisions set by law and the Health & Safety regulations.

A.5. Uninsured Labour

Vassiliko Cement Works anticipates from Suppliers/ Contractors/ Collaborators to fully conform to laws and regulations of social security insurance legislation for their employees.



B. HEALTH AND SAFETY

B.1. Labour Health & Safety

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works should conform to all existing laws concerning Health & Safety at the workplace. They must provide a working environment that pays attention to health and safety to employees, according to international standards and national regulations, including prevention and treatment of employees' exposure to possible risks and labour accidents and diseases. They must also inform and train their employees about health and safety issues to anticipate, avoid and manage risks.

B.2. Labour Accidents & Occupational Diseases

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works should have systems of recording, classification, management and investigation of labour accidents or diseases at their workplace, to be able to act upon relevant corrective acts to eliminate the reasons that have caused the specific situations. They must commit to the provision of the essential medical examinations and treatment to their employees in case of an accident or disease.

B.3. Physically Strenuous Labour

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works must be in position to assess and check the exposure of their employees to physically strenuous and demanding tasks, including manual handling of materials and lifting heavy objects, extended standing and repeated tasks.

B.4. Personal Protection Equipment

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works ought to provide all the necessary means of personal protection (eyeglasses, vest, masks, helmet, gloves, etc.) to their employees, in case they perform tasks dangerous for their health and safety.

B.5. Alert to Emergency Systems

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works should possess and apply emergency plans that aim to the anticipation, recognition and assessment of dangerous situations and events, protecting this way their employees and premises. They should apply emergency management procedures including case reports, evacuation directions, first aid provision, firefighting systems, employees training, readiness exercises.

B.6. Health & Safety Policy

The establishment and application of a Health & Safety Policy by the Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works is welcomed and will be taken into consideration during their evaluation.

C. ENVIRONMENT

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works conform to all standing laws and regulations concerning the environment. They recognize that environmental responsibility is a prerequisite for internationally recognised products and services supply and for the general welfare of the society.

C.1. Pollution Prevention and Depletion of Natural Resources

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works should systematically care for the correct and effective use of natural resources and to prevent or minimize any negative effect to the environment. They have to show concern for the environment and promote environmental performance to several domains, including greenhouse gas emissions reduction, trash recycling, noise abatement, responsible management of wastes and dangerous substances concerning their effect, sound use of natural resources, energy savings and generally the adoption of policies and practices of sustainable development.

Vassiliko Cement Works is at the disposal of Suppliers/ Contractors/ Collaborators to examine cases of collaboration and support them in using such practices.

C.2. Dangerous Substances, Impure Water and Solid Waste Emission

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works ought to conform to the standing law, rules and guidelines about:

- The prohibition or limitation of use for certain substances.
- The recognition, observation, safe management and use, transfer, storage, recycling, reuse and disposal of substances which, if released, they constitute danger for the environment.
- The visible marking of such dangerous substances.
- The observation, check and disposal of impure water, as also the solid wastes that arise from their operation, industrial processing and drainage system.

C.3. Environmental Policy

The establishment and application of environmental policy including the relevant procedures by Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works will be taken into consideration during their evaluation.

D. ETHICS

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works must commit to ethical behavior towards employees, suppliers and clients. They have to conduct their business activity according to the highest standards of conduct and according to all relevant rules.

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works are expected **to have the professional competency, the experience and the appropriate means for performing their work and for providing services and products to the company.**

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works are expected **to perform their work and provide products and services to the company according to international best practices and standards.**

D.1. Corruption, Blackmail or Embezzlement

Corruption, blackmail and embezzlement of any kind are strictly prohibited and can constitute a cause of immediate termination of collaboration with a Supplier/ Contractor/ Collaborator.

D.2. Information Disclosure

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works must be in position-when asked-to disclose to the company essential information about their professional activities, structure and economic performance, according to the standing law and regulations. The company guarantees that this information will strictly remain in the company and will not be disclosed to third parties.

D.3. Intellectual Property Protection

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works ought to respect intellectual property rights and commit for the effective protection of clients, suppliers and collaborators' information concerning their business activities, the economic situation or any other data deemed confidential.

Moreover, the Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works are obliged, during work based on relevant contracts and after completion and delivery, to handle all information, documents and generally facts that will come to their knowledge, which are not already known and refer to Vassiliko Cement Works, to clients or to third parties, with confidentiality and discretion exclusively aiming to the purpose of services and products rendered, to not disclose part or the total of them by any way to a third party and not to allow access to third parties.

The Suppliers/ Contractors/ Collaborators of Vassiliko Cement Works take the responsibility, during the execution of their work and after completion and delivery, not to announce or disclose data in any way, audit findings or results of their work to third parties, not to use them for other purposes but only for the execution of the relevant contracts with the company and not to keep copies or files related to their work after delivery if this is not essential and necessary.

The undersigned certifies that he/she understands and complies to all standing laws and to the present code of conduct for Supplier of Vassiliko Cement Works. The Suppliers/ Contractors/ Collaborators are expected to immediately assume the necessary corrective acts for the prompt rectifications of any kind of no compliance. Vassiliko Cement Works reserves the right to denounce its business relation with any Supplier/ Contractor/ Collaborator not willing to comply to the present Code.

Vassiliko Cement Works reserves its right to ask from a Supplier/ Contractor/ Collaborator, whenever deemed necessary, data that prove compliance of the Supplier/ Contractor/ Collaborator to the present Code of Conduct, including programmed in situ visit of executives or authorized company contractors at stores, branches, premises, factories, offices and other facilities of the Supplier/ Contractor/ Collaborator.



Stelios Sykopetrides
Deputy General Manager
Operations Manager

E. COMMUNICATION IN RELATION TO THE CODE OF CONDUCT

The relevant executives from Vassiliko Cement Works responsible for compliance and application of the present Code of Conduct are: Mrs. Alexandra Alexandrou, CSR & Communication Responsible Tel: (+)357 24 845 308, e-mail: a.alexandrou@vassiliko.com and Ms. Zoi Riga, Public Relations & Crisis Communication Responsible Tel: (+)357 24 845 357, e-mail: z.riga@vassiliko.com

Any Supplier/ Contractor/ Collaborator of Vassiliko Cement Works may submit in writing questions and or require clarifications about this Code of Conduct.

Non-acceptance of this Code of Conduct by a Supplier/ Contractor/ Collaborator means non-inclusion in the approved list of certified Suppliers/ Contractors/ Collaborators of the Company.

DECLARATION OF AGREEMENT AND ACCOUNTABILITY

After completing the blank spaces, please remove words in parenthesis.

..... (Company Name), a company that

has legally been established in (Name of Country)

Holder of Registry/ Permit Number:

solemnly declares that understands and accepts the Content of this Code of Conduct, including the present Declaration of Agreement and Accountability today, on

..... (Day) (Month) (Year)

.....
(Name and Title)



VASSILIKO CEMENT WORKS

PUBLIC COMPANY LTD

Since 1963

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