



ATRIUM SUSTAINABILITY PROCUREMENT POLICY

Introduction

At all Atrium companies controlled by Atrium Holding 1 Limited with registered seat in Cyprus (“**Atrium**”) we are committed to making a positive contribution to society and the environment by developing and implementing ethical business practices that allow us to deliver financial success while ensuring our business strategy and operations are conducted in a responsible manner. We pride ourselves on being an ethical business, and we expect the suppliers/partners with whom we work to share these standards. In doing this, we seek to create value for our shareholders and our broader stakeholders, including our employees, our business partners, and the communities in which we operate.

This policy is in line with the UN Guiding Principles on Business and Human Rights and is based on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

This policy applies to all Atrium suppliers and service providers (hereafter "the Supplier" or "Suppliers").

The provisions of this policy extend to all the Supplier's employees, including those engaged informally, on short-term contracts, or on a part-time basis. It is the responsibility of Suppliers to ensure that their sub-suppliers and other third parties acting on their behalf do not violate the standards of this policy, which includes without limitation responsibility for communicating its content.

Atrium will periodically review the adequacy and continuing effectiveness of this policy and notify our Suppliers of any resulting revisions.

Compliance

Our Suppliers must adhere to this policy and comply with all applicable laws and regulations; in the event of any inconsistency, Suppliers must observe the more stringent requirements. Atrium expects Suppliers to be able to provide evidence of their compliance with this policy and all applicable laws upon request.

We strive to continuously improve and strongly believe that building long-term, collaborative relationships with Suppliers is crucial for our business. We value honest and open communication and believe that transparency is vital to successful business relationships. We expect our Suppliers to comply with this policy and our Suppliers must, in the event of (i) any non-compliance, be committed to, and engaged in, remedying such non-compliance in a timely manner and (ii) any violations of this policy, inform the relevant Atrium management and/or legal person.

We reserve the right to verify Suppliers' compliance with this policy, the right to enter into dialog with the Supplier on reasons standing behind the difficulties with full implementation of herein policy and the right to invite Supplier's representative to the training on the values standing behind herein policy. In case the Supplier in bad faith repeatedly disregard this policy Atrium reserves the right to exclude the Supplier from its tendering system or not to continue co-operation with this Supplier in the future.

Our principles

1. Non-discrimination

The Supplier shall not discriminate against or between employees on any grounds and any employment-related decisions, including hiring, termination and retirement, shall be based solely on relevant and objective criteria.

2. Forced labour

The Supplier shall not participate in or benefit from any form of forced labour and Suppliers' employees shall be allowed to move around freely and leave their place of work when their shift ends.

3. Child labour

The supplier shall not engage in or benefit from the use of child labour. All Suppliers' full-time employees must have the minimum age required for full-time employment under the applicable laws of where the work is performed.

4. Freedom of association and collective bargaining

The Supplier shall respect the right of employees to form and join trade unions and to negotiate collectively. Suppliers shall not attempt to influence employees' choice of trade union membership and shall not dismiss employees solely because of their affiliation to a trade union. If there is no legally recognized union in the area of operations, or if state-authorized organizations alone are allowed, the Supplier shall facilitate alternative means for effective representation of employees' interests.

5. Harassment

The Supplier shall protect employees from any acts of physical, verbal, sexual or psychological harassment, abuse or threats in the workplace by their fellow employees or managers.

6. Working hours, benefits and wages

The Supplier shall adhere to the strictest applicable laws and/or industry standards relating to wages, working hours, overtime and benefits. Suppliers' employees shall be entitled to minimum guaranteed by the national law days off in relevant calculation period and shall be given reasonable breaks while working and sufficient rest periods between shifts. Wage deductions as a disciplinary measure shall not be permitted without the express permission of the relevant employee, unless provided for by national law.

7. Paid leave

The Supplier shall grant all employees the right to sick leave and annual holiday, as well as parental leave for relevant employees with a newborn or newly adopted child, as provided by applicable legislation. Employees who take parental leave shall not face dismissal or threat of dismissal and shall be able to return to their former employment at the same rate of pay and with the same benefits.

8. Health and safety

The Supplier shall ensure that it provides for its employees a safe and healthy working environment and the protective equipment and training necessary to perform their tasks safely. The supplier shall formulate and maintain health and safety plans that clearly set out measures to safeguard employees and others affected by its activities. In addition, Suppliers shall actively identify and eliminate or control hazards that present a risk to employees and other persons present on its sites and to the environment.

The Supplier shall, in accordance with applicable legislation, develop and maintain effective systems for informing and consulting employees on relevant health and safety matters and

keeping accurate records of accidents, injuries and known exposure to health and safety risks at work.

The Supplier shall provide a suitable, clean and sanitary infrastructure, which meets the needs of its employees and is adequate for its employee numbers. Such sanitary infrastructure is applicable to both the workplace and any accommodation provided by Supplier, and shall include access to toilets, potable water and if appropriate sanitary facilities for storage of food.

The Supplier shall establish and maintain procedures designed to prevent accidents and emergency procedures to effectively respond to all health emergencies and industrial incidents affecting the surrounding community.

9. Environmental responsibility

The Supplier shall comply with and maintain awareness of all current and applicable legislation and requirements relevant to the environmental impacts of its activities, products and services. Suppliers shall proactively ensure compliance with environmental regulations through ongoing training of all relevant employees and effective operational control and monitoring across their business activities.

The Supplier shall strive to prevent, and shall operate effective systems to minimize, remedy and report, any adverse environmental impact from its activities, products and services. The Supplier shall ensure continuous improvements in its overall environmental performance and shall be committed to working with its own suppliers to enhance environmental performance throughout the product supply chain.

The Supplier shall ensure compliance with applicable laws and regulations in connection with air emissions, noise pollution and ground and water discharges.

The Supplier shall establish and maintain (i) a list of hazardous and non-hazardous waste materials in order to monitor the types and amounts of waste materials it generates and (ii) procedures for safe handling, transportation and disposal of waste. Hazardous waste shall not be placed in landfill sites or incinerated on site unless authorized and approved by the applicable authorities. If non-hazardous waste is placed in landfill sites or incinerated on site, all relevant legal requirements shall be fulfilled.

The Supplier shall maintain written procedures, together with clear guidelines, for the procurement, storage, handling and use of chemical substances, with specific emphasis on hazardous materials.

10. Corruption and bribery

The Supplier shall comply with all applicable anti-corruption and anti-bribery laws in relation to its business activities, and in particular, it shall not (i) try to gain undue advantage (i.e. an advantage to which it is not entitled) by promising, offering or giving anything of value, directly or indirectly, to any public official, business partner or any other third party or (ii) engage in any other form of corruption, extortion, embezzlement, or fraud which seeks to unjustly obtain improper advantages or otherwise influence the outcome of its business dealings. Suppliers must ensure that all relevant employees and third parties have knowledge of and comply with applicable anti-corruption laws.

11. Fraud

Atrium does not tolerate any level of fraud and expects the same from its Suppliers. Suppliers must ensure that all relevant employees comply with this and be aware of the fact that any failure to comply with above rule will lead to disciplinary action (including immediate dismissal). Supplier must ensure all personnel are responsible for:

- Reporting any suspicion of fraud promptly
- Complying at all times with relevant controls, policies and procedures; and
- Alerting their line manager and/or compliance where they believe the opportunity for fraud exists because of poor procedure or lack of effective oversight

12. Gifts and entertainment

The Supplier shall refrain from offering funding, donations, lavish gifts and extravagant entertainment or hospitality to any employees of, or other counterparts in, the Atrium Group in an attempt to influence business decisions. The Supplier shall ensure that any and all gifts and entertainment offered to Atrium employees are transparent and have a justifiable business rationale.