Labour and Ethical Policy Statement

Sellas Olive Oil Trade LTD recognize the obligation to provide our customers with high quality, professional goods and services while ensuring that at no point is any person in any part of the supply chain (suppliers of raw materials - packaging materials, transport companies, customers) exploited or treated in a way that breaks relevant employment legislation.

We are aware of the responsibilities we bear to all parties involved in each of the stages involved in producing our products and have such developed this policy to outline the standards that we, and ultimately all stakeholders involved with the business, should seek to adhere to, *as we do.*

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing our labour and ethical standards to all parts of our supply chain we hope to develop better ethical standards by motivating our suppliers to adhere to it.

Sellas Olive Oil Trade LTD is committed to implementing and enforcing the following:

Labour Standard-Human Rights:

- **Freely Chosen Employment:** Forced, bonded, or indentured labour, is not to be used. All work must be voluntary and workers shall be free to terminate their employment.
- **Child Labour Avoidance/Apprenticeships:** Child labour is not to be used. The term "child" refers to any person under the age for completing compulsory education or under the minimum age for employment in the country.
- **Working Hours:** Continuous overtime causes worker strain that may lead to reduced productivity, increased turnover and increased injury and illnesses. In Sellas Olive oil Trade Ltd work weeks are not exceed the maximum set by national law. Sellas Olive Oil Trade Ltd will monitor overtime and rest day utilization and take appropriate action to address instances deemed excessive.
- **Wages & Benefits:** Compensation paid to workers *complies* with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with national laws, workers *are* compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure *are* not permitted. The basis on which workers are being paid is to be provided.
- **Regular employment is provided:** Every possible work performed is based on the basis of recognised employment relationship established through the national law and practice. Labour-only contracting, sub-contracting, home-working arrangements and apprenticeship schemes are not to be used. Apprenticeship schemes are used only to impact skills or provide regular employment. Regular employment is provided in compliance with national laws and regulations.
- **Human Treatment:** Any harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or

verbal abuse of employees/workers, will not be tolerated, nor is there to be threatening of such treatment.

- **Non-Discrimination:** Sellas Olive Oil Trade Ltd is committed to a workforce free of harassment and unlawful discrimination. The company is not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and in employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

- **Freedom of Association:** In accordance with national law, Sellas Olive Oil Trade Ltd respects the rights of workers to associate freely, join or not join labour unions and or to seek representation.

- **Non-Retaliation:** Sellas Olive Oil Trade Ltd has communicated a process for employees/workers to raise any concerns without fear of retaliation.

- **Working conditions are safe and hygienic:** In accordance with national law, Sellas Olive Oil Trade Ltd provides a safe and hygienic working environment. Adequate steps have been taken to prevent accidents and injury to health that may occur due to the working environment. All workers (including new comers) receive regular and recorded health and safety training. Clean toilet facilities, sanitary facilities for food storage and potable water are provided to all workers.

- **Hiring a worker:** No worker should pay for a job. The costs of recruitment or other related costs (refers to any costs or fees incurred in the recruitment process in order to secure the employment or placement, regardless of how, when or where they are imposed) and charges for prospective work; they should be paid by the employer and not by the employee.

- **Whistleblowing:** The company encourage the workers to express their concerns about an incident that happened in the past, is happening now, or is believed will happen in the future. Complaints can be made through the complaint box either anonymously or by name. If the worker does not want to report internally, then there is official National Independent Authority where the worker can submit a complaint either via the line 1555, or via email following the instructions on the site sepe.gov.gr. *In addition, a poster has been displayed in prominent locations where employees can report any complaints or violations to "Call it out" via Safecall.*

- **Entitlement to work:** Sellas Olive Oil Trade Ltd employ only employees with legal right to work in the country. The original documents will be reviewed to verify right to work and then will be returned to workers.

- ***Disciplinary Management****: The company expects all employees to comply with internal rules, work procedures, and the requirements of their position. In cases of non-compliance or unacceptable behaviour, the company applies a fair and objective process for reviewing the incident. Depending on the severity of the case, a verbal or written warning/recommendation may be issued to the employee, and appropriate measures may be taken in accordance with applicable labour legislation.*

- ***Termination of Employment:*** *The employment relationship may be terminated either by the initiative of the employee or the company, in accordance with the terms of the employment contract and applicable labour legislation. During the termination process, the necessary administrative actions are carried out, including*

the return of company equipment and documents, and the settlement of any outstanding matters between the employee and the company.

Ethical Standard:

- **Business Integrity:** All forms of bribery, corruption, extortion and embezzlement are prohibited. All business dealings should be transparently performed and accurately reflected on Sellas' business books and records and in compliance with anti-corruption laws.
- **No Improper Advantage:** Bribes or other means of obtaining undue or improper advantage are not be offered or accepted.
- **Intellectual Property:** Intellectual property rights are to be respected. The transfer of know-how is to be done in a manner that protects intellectual property rights.
- **Fair business, Advertising and Competition:** Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information are available.
- **Protection of Identity:** Sellas Olive oil Trade Ltd is committed to protecting the reasonable privacy expectations of personal information of all its partners, including suppliers, customers, consumers and employees. Sellas Olive oil Trade Ltd shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

Sellas Olive Oil Trade LTD commit to undertake, when contracting a new supplier, regular routine visits to suppliers, to ensure that labour and ethical standards throughout our supply chain are satisfactory and continually improving.

Sellas Olive Oil Trade LTD is a family business and there is communication and contact between management and employees. It has a responsibility to respect human rights. In any case that causes or contributes to adverse effects on the human rights of employees, it is directly involved in the restoration of relations.

We recognize that if any contractor or sub-contractor were found to be using unethical or illegal labour or ethical programs, this would have a profound impact on the reputation and integrity of the company.

All the above, applies to employees and workers in Sellas Olive Oil Trade Ltd.

The timescale of the Labour and Ethical Standards Status Review is subject to change, given the findings from previous reviews, as deemed appropriate by senior management during a Quality Management Review.

-The Manager-

Ioannis Sellas