



OMEGA – L. GRANTAS SA

Code of Conduct for Partners & Suppliers

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Production of Knitting Items

7th klm. Thessaloniki-Oreokastro // Thessaloniki - Greece

Tel. +30 -2310 685 500 // Email : lgrantas@yahoo.gr



1. Introduction

The Code of Conduct (hereinafter the **Code**) of L. GRANTAS S.A. (hereinafter: **Company**) for Partners, Suppliers, Manufacturers, Contractors, Subcontractors (hereinafter: **Partners**) sets the standards of ethical and responsible conduct that the Partners of the products and services that the Company markets in all its activities, in accordance with the corporate culture of the L. GRADAS S.A. Group, based firmly on respect for human and labour rights. The Company is committed to making available the appropriate resources so that partners know and understand this Code and are able to ensure their compliance on the basis of this.

The Code applies to all Partners involved in the processes of purchase, manufacture, processing and finishing of its products and services and promotes and is based on the following general principles that determine the ethical behavior of the Company:

- All the Company's processes are developed in an ethical and responsible manner.
- All individuals or business entities, who maintain, directly or indirectly, any kind of employment, economic, social and/or industrial relationship with the Company, are treated fairly and with dignity.
- All activities of the Company are carried out in a way that respects the environment as much as possible.
- All Partners (not members of the Company) fully comply with these commitments and undertake to ensure that the standards set out in the Code are met.

2. Zero tolerance to forced labour

The Company shows zero tolerance to any form of forced or unintentional work to the employees of its Partners. Partners do not

have the right to keep identity documents of their employees. Partners recognise the right of their employees to leave their employer after reasonable notice⁽¹⁾.

3. Zero tolerance for child labour

The Company shows zero tolerance to any form of child labor. Its Partners are not allowed to employ minors. The Company defines minors as those who have not yet reached the age of 16. In cases where local law sets a higher minimum age, the higher limit applies to⁽²⁾.

People between the ages of 16 and 18 will be considered as new employees. Young workers should not work during the night or in dangerous conditions.⁽³⁾

4. Zero tolerance to any kind of discrimination

The Company shows zero tolerance for any kind of discrimination. Partners may not engage in any discriminatory practice with regard to recruitment, compensation, access to education, promotion, termination of employment contract or retirement, on the basis of race, caste, religion, doctrine, nationality, age, physical or mental disability, sex, marital status, sexual orientation and/or membership in trade unions or political beliefs⁽⁴⁾.

¹ Issues related to these restrictions will be governed by International Labour Organisation (ILO) Conventions 29 and 105

² Issues related to the prohibition of child labour are developed in accordance with International Labour Organisation (ILO) Conventions 138 and 182

³ Issues related to the working conditions of young workers will be governed by ILO Recommendations 190

⁴ Issues related to working practices will be developed in accordance with ILO Convention 111



5. Respect for freedom of association and collective bargaining

Partners ensure that their employees, without discrimination, have the right to association, group membership and collective bargaining. No retaliation can result from the exercise of this right and no fees, payments or any form of bribery may be offered to officials to prevent the exercise of such a right. Similarly, they will adopt an open and cooperative attitude towards the activities of trade unions.

Workers' representatives shall be protected from any discrimination and shall be free to perform their representative functions at their workplace.

Where the rights of freedom of association and collective bargaining are restricted by law, appropriate channels should be designed to ensure a reasonable and independent exercise of those rights⁽⁵⁾.

6. Zero tolerance for any kind of cruel or inhuman treatment

The Company shows zero tolerance for any kind of cruel or inhuman treatment. Partners are obliged to treat their employees with dignity and respect. Physical punishment, sexual or racial harassment, verbal or physical abuse of power or any other form of harassment or intimidation is prohibited.

7. Safe and healthy working conditions

Partners must provide a safe and healthy workplace for their employees, ensuring minimum lighting, ventilation, hygiene, fire prevention, safety measures and clean toilets and drinking water supply. Where necessary,

food storage facilities are provided. Accommodations, where provided, must be clean and safe.

Partners are responsible for taking the necessary measures to prevent accidents and injuries to the health of their employees, minimizing as much as possible the inherent risks at work.

Partners are required to provide their employees with regular health and safety training at work. The Partner needs to maintain an appropriate record of the training courses that have been done. Similarly, it designates a person responsible for health and safety in the context of management, duly authorized and with the appropriate decision-making power⁽⁶⁾.

8. All salaries are paid

Partners shall ensure that salaries paid meet at least the legal or collective agreement (if higher). Wages should always be sufficient to meet at least the basic needs of workers and their families and any other need that could be considered as a reasonable additional need.

Partners must not make reductions and/or deductions from salaries for disciplinary purposes, nor for reasons other than those provided for by applicable regulations, without the express permission of employees. Similarly, they provide all employees with written and comprehensible information on their salary conditions at the time of recruitment, as well as detailed information on their salary details each time they are paid.

⁵ Issues relating to freedom of association and collective bargaining are developed in accordance with ILO Conventions 87, 98 and 135.

⁶ Issues relating to working conditions related to health and safety at work will be governed by ILO Convention 155.



Partners shall also ensure that salaries and any other allowances or benefits are paid on time and made fully in accordance with all applicable laws, in particular, that payments are made in the way that best suits employees⁽⁷⁾.

9. Working hours are not excessive

Partners shall adapt the duration of the working day to the provisions of the applicable legislation or collective agreement applicable to the sector in question, provided that the latter provides greater protection to workers.

Partners do not require their employees to work, as a rule, more than 48 hours per week, and employees are granted at least one day off for every 7 calendar days on average.

Overtime is optional, does not exceed 12 hours per week, is not requested on a regular basis and is always reimbursed at a premium, in accordance with the provisions of the applicable regulations⁽⁸⁾.

10. Regular employment

Partners assume that all types of employee employment they use are part of applicable local law. Therefore, they must not affect the rights of workers recognised under labour and social security laws and regulations by using systems which have no real intention of promoting regular employment in the context of regular industrial relations.

⁷ Issues related to the payment of salaries will be governed by ILO Conventions 26 and 131

⁸ The issue of working days will be governed by ILO Conventions 1 and 14.

11. Traceability of production

Partners may not assign any work to third parties without the prior written permission of the Company. Those who outsource any work are responsible for the execution of the Code by such third parties and their employees.

Similarly, Partners apply the principles of this Code to any work that deals with their supply chain and provide transparency to the locations and working conditions of these local employees.

12. Health and safety of products

Partners are responsible for all products provided to the Company to comply with the Company's product health and safety standards, so that commercial products do not pose any risk to customers.

13. Environmental awareness

Partners are duly committed at all times to environmental protection and comply with the standards and requirements of applicable local and international laws and regulations.

Similarly, they undertake to comply with the environmental standards established by the Company, including, where appropriate, the measures necessary to reduce and offset these impacts in order to implement those standards.

14. Confidentiality of information

Partners maintain the integrity and confidentiality of the information they receive as a result of their commercial relationship with the Company.

The confidentiality obligation will remain as soon as the relationship with the Company ends and will include the obligation to return any material related to the company held by the Partner.



15. Code Application

Partners implement and maintain programs for the implementation of this Code. They appoint a senior member of the administration who is responsible for the implementation and execution of this Code.

Partners communicate the Code to all employees and those involved in any way in the Company's supply chain.

A copy of the Code, translated into the local language, appears in accessible spaces to all employees.

15.1 Transparency

Partners conduct their activities in an honest, straightforward and transparent manner, maintaining for these purposes an appropriate accounting records system that facilitates the traceability of their decisions, as a precautionary measure against any kind of corruption, bribery and extortion that may arise.

Partners will not offer, grant, request or accept gifts or donations to/from buyers of the Company that may violate the provisions of the Code.

Partners do not manipulate or influence their employees, nor falsify files or files in order to modify the verification process regarding compliance with this Code.

Partners shall not offer or accept remuneration of any kind sought or may be deemed to seek to affect the impartial judgment or objectivity of such parties appointed by the Company to carry out compliance inspections and audits in connection with this Code.

15.2 Reference to National Legislation, Conventions and Agreements

The provisions of this Code are only minimum standards. Where national regulations or any other applicable law or any other commitments entered into or implemented, including collective agreements, govern the same issue, the provision providing greater protection to workers shall apply.

The Company undertakes, within the framework of its internal rules, the content of the national and international agreements and conventions to which it has acceded and that they apply in its relationship with its Partners, committed to their promotion and compliance.

15.3 Verification of compliance

Partners allow the Company, and/or third parties that the Partner may appoint, to monitor the correct application of the Code. For these purposes, they shall provide the necessary means and appropriate access to the premises and documents necessary to ensure such verification.

15.4 Ethics Committee and Complaint Channel

This Code is in line with the principles and values contained in the Company's Code of Business and Ethical Conduct and, which regulates an ethics committee to ensure its enforcement.

In this sense, and in order to ensure the enforcement of the Code for Partners, the Ethics Committee may act on its own initiative or following a formal complaint filed in good faith by a Partner, or another interested third party that may have any direct or indirect relationship or commercial or professional interest with the Company.

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