



Integrated Business Ethics, Quality, Environment, Energy, Health & Safety and Social Responsibility Policy

THRACE Nonwovens & Geosynthetics S.A. (hereinafter referred to as **“the Company”**) establishes this Policy as a single statement of principles and commitments for Quality, Environment, Energy, Occupational Health & Safety, Ethics and Social Responsibility, in accordance with ISO 9001, ISO 14001, ISO 45001, ISO 50001 and SA8000 standards. The Policy constitutes a framework for setting objectives for management systems. This Policy is available to personnel and interested parties, is posted in the workplaces and is published on the Company’s website.

1. Scope

The Policy applies to all operations, facilities and activities of the Company, including the design, production, printing, processing and quality control of the following product categories:

- Woven geotextiles, agrotextiles, special/technical/industrial fabrics.
- Non-woven fabrics of needle-punch type for applications of geotextiles, geosynthetics and related products, agricultural textiles, furniture fabrics and for other general industrial uses.
- Spunbond type non-woven fabrics for medical/paramedical applications, furniture applications and other general industrial uses.
- Synthetic yarns and CF fibres & yarns.
- Polymer fibers for concrete.
- Geogrids, geonets, circular fabrics, nets, ropes and twine.
- Insulating membranes for roof and masonry, breathable or not.
- Laminated fabrics for medical/paramedical applications and other general industrial uses.
- Plastic pipes for wrapping products.
- Recycled regranulated material from internal and external waste sources.

2. Organizational Framework & Stakeholders

The Company identifies the internal and external context, as well as the stakeholders (customers, employees, shareholders, suppliers/contractors, authorities, local communities). Their needs/expectations are assessed and integrated into the design of management systems.

3. Principles & General Commitments

- Continuous improvement of process efficiency and overall performance (QMS, EMS, EnMS, OH&S).
- Full compliance with laws, regulations, contractual and other compliance obligations.
- Integrity and zero tolerance for corruption, unfair competition and irregularities.
- Establishment of annual goals/measurable objectives with documented monitoring of indicators and Management reviews.
- Systematic training/awareness-raising and effective communication with stakeholders.
- Awareness: All employees are aware of the Policy, its objectives, their contribution to compliance and improvement and the consequences of non-compliance.
- Competency: the Company identifies the required competency, provides training, evaluates its effectiveness, and maintains relevant records.

4. Quality Commitment

The Company is committed to continuously improving customer satisfaction through systematic monitoring and data analysis.

- Customer satisfaction and compliance with requirements/specifications.
- Process approach and risk-based thinking: identifying/evaluating/addressing risks & opportunities per process.
- Setting of quality objectives, indicators, internal controls and Management (MR) reviews.
- Change management and control of documented information.
- Control of externally supplied processes/products/services and evaluation of suppliers.

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- Monitoring customer satisfaction and effective communication channels.

5. Environmental policy

The Environmental Management System supports and aligns with the Company's purpose and strategic direction.

- Environmental protection, pollution prevention, sustainable use of resources, including the sustainable use of natural resources and addressing climate change where relevant.
- Compliance with compliance obligations and continuous improvement of environmental performance, considering a life cycle perspective of products and activities.
- Identification of significant environmental aspects with a life cycle perspective and operational integration.
- Environmental objectives/programs with measurable indicators and regular assessment of compliance.
- Preparedness & response to environmental emergencies (plans, tests, review).
- Public availability of the policy and appropriate external communication where required.

6. Occupational Health & Safety Policy

The Company is committed to eliminating risks and reducing Health & Safety risks at work, though:

- Providing safe and healthy conditions to prevent injuries/illnesses.
- Eliminating risks and reducing risks based on a hierarchy of controls.

The Company ensures active and continuous participation and consultation of employees and their representatives, with

- Participation and consultation of all employees and their representatives.
- Legal compliance, H&S objectives and continuous improvement.
- Risk identification, change management (MOC), contractor/supplier control.
- Preparedness & response to emergency situations (exercises, assessment).

7. Energy Policy

The Company is committed to continuously improving its energy performance, ensuring the availability of information and resources, achieving energy targets and supporting energy-efficient design and procurement.

- Continuous improvement of energy performance (efficiency, use, consumption).
- Availability of information/resources for achieving targets and energy review.
- Establishment of EnPIs, baselines (EnB) and energy data collection plan.
- Procurement of products and services supports energy performance improvement.
- Design of facilities, equipment and processes takes into account energy performance improvement.
- Compliance with legal/other energy requirements and transparent internal/external communication.
- Boundary: functional and organizational boundaries and any overlaps with third parties are defined; the energy policy is implemented within the above boundaries.
- EnMS Scope & Boundaries: the Energy Management System covers the facilities/processes [to be completed] and the main energy uses (e.g. electricity, natural gas, steam, compressed air), with any exceptions documented.

8. Ethical & Social Responsibility

The Company is committed to fully complying with the requirements of the SA8000 standard and applies a human rights due diligence approach to identify, prevent, mitigate and monitor social risks and impacts in its activities and business relationships.

Child Labor

- Child labor is prohibited. Minimum age of employment in accordance with legislation and relevant International Labor Organization (ILO) conventions.
- Remedial procedure for any identification and protection of young workers (non-hazardous work, working hours).

Forced or Compulsory Labor

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- All forms of forced labor, human trafficking or withholding of documents/compensation are prohibited.
- Freedom to voluntarily leave work with reasonable notice in accordance with the law.

Health & Safety

- Safe/healthy environment, risk assessment, PPE, training and H&S committees.
- Access to drinking water, sanitation and first aid.

Freedom of Association & Collective Bargaining

- Respect for freedom of association and the right to collective bargaining.
- Where the law restricts, alternative representation mechanisms are available.

Non-Discrimination

- All types of discrimination are prohibited, such as discrimination based on gender, race, religion, age, disability, sexual orientation, nationality, etc.
- Provision of staff training, complaint channels and management framework.

Privacy

The Company respects and protects the privacy, personal data and dignity of employees, ensuring that the collection, use, storage and access to personal data is only for lawful, fair and transparent purposes.

Disciplinary Practices

- Prohibition of physical or psychological punishment, insults, harassment or humiliating practices.
- Disciplinary procedures are fair, proportionate and documented.

Working Hours

- Compliance with legally prescribed working time limits and rest provisions.
- Voluntary overtime, documented, with legal increments and not systematically >12 hours/week.

Remuneration

- Provision of remuneration that ensures the legal minimum wages and is provided in a timely and transparent manner.
- Provision of additional benefits to staff beyond salary.

SA8000 Management System

- Appointment of an SA8000 Representative and establishment of a Social Performance Team (SPT).
- Identification/assessment of social risks, training, internal controls and corrective/preventive actions.
- Grievance mechanism with assurance of confidentiality, possibility of anonymous reporting where permitted, protection of reporters and prohibition of retaliation.
- Requirements for suppliers/contractors, Code of Conduct and due diligence in the supply chain.

9. Communication & Availability

The Policy is communicated to staff, posted on the workplaces and on the intranet/website. It is provided to interested parties upon request and is available in languages that staff and partners understand.

10. Governance, Roles & Responsibilities

- Top Management provides leadership, alignment and resources and approves the Policy.
- System Managers (QMS, EMS, EnMS, H&S, SA8000) and Management Representative are appointed.
- All employees comply with the procedures and actively participate in the improvement.

11. Targets, Objectives, Indicators & Programs

- Establish annual targets/measurable targets (e.g. SCRAP%, complaints/sales, kWh/tonne, CO₂e/tonne, LTIF/TRIR).

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- Achievement programs with managers, timelines, and resources.
- Statistical analysis, performance reports, and integration into MRs.

12. Managing Risks/Opportunities & Changes

- Methodology for identifying/assessing risks & opportunities per process (Q/Energy/Env/OH&S/SA).
- Integration into business planning and linking to goals/programs.
- Change Management (MOC): impact assessment, approval, communication, and training.

13. Monitoring, Audits & Reports

- Monitoring/measurement program, calibration, conformity assessment and internal controls.
- Energy Review, EnPIs, EnB, and Energy Data Collection Plan (sources, roles, frequencies).
- Non-compliance & corrective actions with root cause analysis and effectiveness verification.
- Management review at least annually with defined inputs/outputs (audit results, performance, compliance, resources, opportunities).

14. Procurement, External Providers & Contractors

- Quality, environmental, energy, HR and SA8000 criteria in procurement/contracts.
- Procurement of energy-efficient products/services and life cycle assessment where applicable.
- Screening of contractors for H&S and social compliance; supplier audits and re-evaluations.

15. Emergencies & Preparedness/Response

- Preparedness & response plans for environmental/H&S incidents.
- Exercises, performance evaluation, reviews and staff training.

16. Documentation & Reviewing

- Version control, distribution and archiving of documentation.
- Annual or extraordinary review in case of changes in activities/risks/requirements.

Approved by the Management of THRACE Nonwovens & Geosynthetics S.A.

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