

FARCOM S.A.
BUSINESS CONTINUITY POLICY

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Annual review: until 07/01/2027 or earlier in case of changes

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1. Purpose

This Policy is issued by «**FARCOM S.A.**» in order to clearly describe and define the framework, the principles and the basic requirements for:

- ensuring the business continuity of the company's critical activities in case of incidents that lead to unavailability or inability to implement them,
- the immediate restoration of operations to acceptable levels in the shortest possible time and with minimization of impacts for customers and other interested parties,
- the high availability of functions and services, with emphasis on critical processes and resources,
- full compliance with the relevant contractual, legal and regulatory requirements,
- the protection of the interests of the company and of all those who transact with it, as well as the satisfaction of customer requirements and those of interested parties,
- the achievement of the company's strategic objectives and the observance of the principles it has adopted in relation to Business Continuity and its sustainable, responsible operation.

2. Scope

The Business Continuity Policy:

- covers all activities, products and services of the company,
- applies to all employees, permanent, temporary and external staff,
- extends to the key partners of the supply chain, to the extent that this is feasible through contractual obligations.

3. Context & Sustainability Principles

The Business Continuity Policy is an operational policy that specifies and supports the Company's Sustainability & Supply Chain Transparency Policy, including the approach to environmental, social and governance matters, due diligence (due diligence) and the participation of interested parties. In addition, this Policy is integrated into the

sustainability system and the overall ESG strategy of the company and takes into account the requirements of legislation, the needs of customers and the contractual commitments, as it is also aligned with the principles of ISO 22301:2019 for business continuity management.

4. Senior Management Commitment

Senior Management:

- Commits to the continuous improvement of the Business Continuity Management System and to the systematic awareness and training of all involved personnel, so that it can respond in the best possible way to incidents that threaten the smooth operation of its critical activities,
- Approves the Business Continuity Policy, and ensures that it is aligned with the strategy, the values and the ESG objectives of the company,
- Provides the necessary human, financial and technological resources for the development, implementation, testing and continuous improvement of the Business Continuity plan,
- Sets measurable objectives, indicators (KPIs) and deadlines, covering both operational and ESG/supply-chain risks,
- Participates in regular review meetings for business continuity and ESG matters,
- Ensures that there are mechanisms for addressing deviations and remedial measures when adverse impacts are identified.

The Business Continuity Management Policy is available to all interested parties, through its posting in visible places at the company's premises as well as on its official website.

5. Business Continuity Principles and Objectives

The Company adopts the following principles:

- The management of business and ESG risks is carried out systematically, with documented assessment and prioritization,
- In every disruption, priority is the safety of employees, the protection of health, human rights and the environment,
- Cooperation with suppliers for transparency, compliance with FARCOM's Code of Conduct and management of critical raw materials,
- The continuity plans, objectives and measures are evaluated and improved regularly.

6. Business Continuity Manager and Business Continuity Team

Management appoints the Technical Director as Business Continuity Manager, who:

- Coordinates the development, implementation and review of the Business Continuity plan,
- Works closely with the Sustainability Officer and the Company's Finance Department,
- Ensures that the principles of Business Continuity are incorporated into the ESG objectives and vice versa,
- Prepares and maintains risk analyses,
- Develops and tests continuity plans,
- Supports incident/crisis management.

7. Risk Management, Impact Analysis

The Company documents, implements and maintains a process for identifying and assessing risks for operations and the supply chain, including at least:

- environmental risks,
- risks for human rights and labor practices,
- business ethics and regulatory compliance risks,
- risks in critical raw materials and suppliers.

Risk and impact analyses are reviewed at least annually or after substantial changes (e.g. new markets, new major suppliers, significant incidents).

8. Prevention, Mitigation Measures & Continuity Plans

Based on the results of the risk and impact analysis it carries out (operational and ESG), FARCOM:

- Prepares and implements preventive, corrective measures for the prevention or mitigation of (potential) adverse impacts on its activities, products, raw materials and the supply chain. These measures are reflected in approved action plans and in the company's Mitigation Plans,
- Develops and maintains business continuity plans for critical functions (e.g. production, storage, distribution, procurement),
- Incorporates into these plans specific measures for the protection of employees, vulnerable groups and the local community, as well as for the prevention and mitigation of adverse environmental impacts during and after a disruption,
- Documents, communicates and tests the measures and continuity plans.
- For selected products and critical raw materials, it implements a risk-based mitigation plan. This plan is reviewed annually and/or in the event of significant changes and, where required, is entered/updated in the IFS auditXpress Neo tool, in cooperation with the Sustainability Officer.

9. Special Provisions for the Supply Chain & Critical Raw Materials

The Company:

1. Maintains an up-to-date supplier register (direct and, based on risk, indirect), with details of country, product/service, activity and role in the supply chain.
2. Identifies and documents critical raw materials based on ESG and operational criteria and incorporates them into the Mitigation Plan (Risk Mitigation Plan).
3. Prepares and implements a Mitigation Plan based on risk assessments for products and raw materials, including:

- alternative suppliers,
 - diversification of geographic sources,
 - partnerships with suppliers to improve ESG performance.
4. Continuously monitors suppliers' compliance with legislation, the Suppliers' Code of Conduct and customer requirements, with audit frequency proportionate to risk.

10. Communication with Interested Parties

The Company maintains a documented process for the management and engagement of interested parties, including:

- identification of directly and indirectly affected parties (employees, customers, suppliers, local communities, authorities, NGOs etc.),
- regular updates on progress towards ESG & Business Continuity objectives, when required (e.g. by customers),
- specific crisis communication protocols, including notification of any interruption in the provision of products/services and the recovery plans.

11. Training, Awareness & Exercises

The Company:

- ensures that all employees receive basic training on Business Continuity & ESG matters, tailored to their role,
- provides specialized training to members of the Business Continuity teams and
- uses the results of exercises to improve processes and measures.

12. Performance Monitoring, KPIs & Continuous Improvement

For the effectiveness of the Business Continuity Policy, the Company:

- defines Monitoring Indicators (KPIs) (e.g. number/severity of incidents, percentage of critical suppliers with updated details and Signatures of the Suppliers' Code of Conduct, number of Complaints),

- monitors performance through regular reports to management,
- conducts at least an annual review of the Business Continuity Policy and its relevance to ESG objectives,
- implements corrective/preventive actions in cases of deviations or significant incidents,
- revises objectives, measures and resources based on the results.

13. Documentation & Change Control

The Business Continuity Policy and the related documents:

- are kept in a controlled documentation system,
- bear date, version, author and approving authority,
- are reviewed at least once per year or when significant changes occur.

14. Entry into Force & Revision

This Policy enters into force as of 01/01/2026 after its approval by Senior Management. This Policy bears a date and a file of previous versions is kept. The Company reviews the Policy at least once per year or earlier when there are changes in legislation, in customer requirements, in the results of the risk assessment or in the internal processes of the company that make its update necessary. During the review, the reasons that led to the modification and the changes made are recorded, so that there is history and transparency. In addition, Management commits to communicate the Policy to all employees and, as appropriate, to external interested parties, as well as to ensure that the Policy is applied in practice through the relevant procedures and work instructions.

The President of the Company

07/01/2026


FARCOM S.A.
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