

POLICY TO PREVENT AND COMBAT DISCRIMINATION, VIOLENCE AND HARASSMENT AT WORK AND MANAGE REPORTS AND COMPLAINTS REGARDING INCIDENTS OF DISCRIMINATION, VIOLENCE AND HARASSMENT

1. DEFINITIONS

DISCRIMINATION

Discrimination means discrimination on the basis of sex, race, colour, ethnic or social origin, genetic characteristics, language, religion or beliefs, political views, disability or state of health, age or sexual orientation.

VIOLENCE AND HARASSMENT

'Violence and harassment' are defined as the types of conduct, acts, practices or threats thereof, which aim, lead to or are likely to result in physical, psychological, sexual or financial harm, regardless of whether these are isolated incidents or repeated occurrences.

'Harassment' is defined as forms of conduct the purpose or result of which is the violation of the dignity of the person and the creation of an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether these constitute a form of discrimination, including gender-based harassment or other reasons for discrimination.

Violence and harassment prohibited by this policy includes, but is not limited to:

- Verbal hostility or harassment, including, for example, abusive comments, insults or accusations;
- Overt threats;
- Threatened or actual physical violence
- Physical harassment, including, for example, physical interference with normal work or movement;
- Intimidation;
- Domestic violence transmitted in the workplace;
- Visual forms of harassment including posters, cartoons, caricatures, photographs or drawings that are derogatory based on characteristics that are protected by the law;
- Retaliation or intimidation in the event of reporting or the threat to report any of the abovementioned forms of harassment or for cooperating in the investigation of a harassment incident.

GENDER-BASED HARASSMENT AND SEXUAL HARASSMENT

Gender-based harassment is the form of behaviour linked to a person's gender which has the intent or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or threatening environment. These types of behaviour include sexual harassment, as well as forms of behaviour linked to a person's sexual orientation, expression, identity or gender characteristics. More specifically, sexual harassment is defined as unwanted conduct of a sexual nature, which includes unwanted sexual propositions, demands for sexual favours, and any other unwanted physical or verbal expressions of a sexual nature. Such behaviour may be shown by a person of any gender, and may involve harassment of a person of any gender. For the purposes of illustration, the following are examples of sexual harassment:

- Offering benefits (such as promotions or salary increases) in exchange for sexual favours or creating an environment conducive to sexual contact as a means of professional advancement in the workplace
- Retaliation or threat of retaliation after rejection of sexual propositioning.
- Visual conduct includes obscene gestures, showing sexually offensive graphic materials in electronic or printed format (e.g. email, voice mail, books, archives, photographs, etc.), cartoons or posters or any material with obscene or sexual innuendo.
- Verbal behaviour includes derogatory comments, sexual innuendo, sexual language or jokes with sexual content.
- Verbal sexual harassment or propositions.

- Verbal abuse of a sexual nature involves sexual comments regarding a person's body, use of sexually derogatory comments to describe a person, sexually suggestive or obscene comments in conversations, letters, invitations, notes or other comments, adjectives
- Physical contact is touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing, and so on.

The acts mentioned above are indicative and do not constitute an exclusive list of prohibited acts. Employees or third parties who engage in such prohibited conduct, bear full responsibility for their actions.

In the context of the above concepts and forms of behaviour, and in order to avoid any misunderstandings and/or misinterpretations in the implementation of this policy that might cause unnecessary and/or unintentional complications, which could negatively affect the smooth running of the Company, it is clarified that as a matter of principle violence and harassment are not an implicit part and do not constitute behaviours that, within the boundaries of the employer's managerial rights, are in any way directly or indirectly connected to supervision and control of employees, their qualitative and quantitative performance, performance evaluations or their presence in the workplace in general.

THE WORKPLACE

The workplace means the wider spatial context in which incidents of discrimination, violence and harassment, gender-based harassment and sexual harassment and domestic violence may take place, namely:

- In the workplace, including public and private spaces and places where employees provide work, receive remuneration, or where they take breaks or rest, or in sanitary and washing areas.
- When commuting to and from work, during other journeys, business trips, education and training sessions, including work-related events and other social activities associated with work.
- In work-related communications, including those carried out through information and communication technologies (corporate emails and mobile phones, corporate portals, social media groups, etc.).

DOMESTIC VIOLENCE

Included within the meaning of domestic violence are all acts of physical, sexual, psychological or economic violence that take place within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners and regardless of whether the perpetrator shares or has shared the same residence as the victim in the past.

One serious form of violence in the workplace is domestic violence which spills over into the workplace, for example in the form of physical violence, sexual harassment, or stalking by current or former domestic partners. Acts of domestic violence, including stalking, may also be committed by people in the same working environment, against people with whom they have (or used to have) close relationships. Domestic violence, in any of the above forms, is also that which may be exercised against employees working remotely.

The Company undertakes to accept, investigate and manage any related reports and complaints, declaring and demonstrating **zero tolerance**, with impartiality, confidentiality and respect for human dignity, taking immediate measures to protect the person affected. The Company further undertakes not to hinder the receipt, investigation and management of such reports and complaints. Furthermore, within the framework of its capabilities, the provisions of the law and this policy, the Company has the capacity to take every appropriate measure and make all reasonable adjustments to working conditions in order to protect employment and support employees who are victims of domestic violence.

RETALIATION AND PROHIBITION OF RETALIATION

The Company prohibits any employee or third party in any way connected with them from taking retaliatory action against other employees or third parties for filing complaints, testifying, assisting or participating in any incident investigation procedure in opposition to violence or any other form of harassment.

2. PURPOSE

The Company complies with all measures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and treatment of all forms of discriminatory violence and harassment, including gender-based violence, sexual harassment, and domestic violence.

The policy aims to prevent and combat all forms of discrimination based on personal characteristics and preferences, to create and secure a working environment that respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment. The Company declares that it acknowledges and respects the right of every employee to a working environment free from violence and harassment, and that it has zero tolerance for any such behaviour of any form by any person manifested in the course of work, whether connected with it or arising from it.

This policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and in implementation thereof, in accordance with other general regulatory legislation covering the persons referred to in Article 3(1) of Law 4808/2021.

3. SCOPE

Management and members of the Company, employees under contracts of employment, service providers under employment contracts, project-based contracts, independent services and temporary employment contracts, persons on secondment, persons employed via third party service providers, or third country personnel, practicing lawyers, practical trainees and apprentices, employees whose employment relationship with the Company has ended, prospective employees of the Company other persons who are engaged in commercial trade or cooperative relationships with the Company.

4. DECLARATION OF ZERO TOLERANCE FOR DISCRIMINATION, VIOLENCE AND HARASSMENT - RISK ASSESSMENT

The Company expresses its commitment to addressing and eliminating discrimination, violence and harassment in the workplace, including gender-based violence and harassment, sexual harassment and domestic violence, with a view to securing a working environment where respect for human dignity prevails and discrimination on the basis of employees' personal characteristics and preferences in general shall be prohibited.

It is expressly and unequivocally declared that all forms of discrimination, violence and harassment, including gender-based violence and harassment, and sexual harassment and domestic violence at work is strictly prohibited, whether linked to the workplace or arising in it or not.

Indicatively and not restrictively, the Company declares that the following are strictly prohibited: innuendo, mockery, making obscene, sexual or racist jokes or comments, using offensive language, making comments about a person's outer appearance or character that could cause embarrassment or make people feel uncomfortable, stalking, directing unwanted verbal or physical attention, sending messages with sexual content in any form [e.g. via mobile phone messages (SMS), electronic messages (email), social media, fax or letter], offensive and persistent questioning about a person's age, marital status, personal life, sexual interests or preferences, as well as similar questions about their race or ethnicity, including their cultural identity and religion, sexual gestures or insistent propositions or threats to arrange meetings, implying that sexual favours may lead to career advancement or that refusal to enter into a sexual relationship may adversely affect a person's professional career with the Group, rude gestures, touching and any kind of unwanted physical contact, spreading malicious comments or insulting someone primarily due to distinctions on the basis of age, gender, type of marriage, cohabitation agreement, pregnancy and motherhood, any form of disability, sexual preferences, religion or beliefs, verbal threats or threatening gestures, public or private insults, belittling or ridiculing a person or their abilities, either in private or in front of others, outbursts of anger against any person, exercising persistent or unjustified criticism, exclusion from social events, working group meetings, discussions and collective decisions or planning, cyberbullying, offensive emails, letters and phone calls.

The Company is committed to accepting, investigating and managing any relevant reports and complaints, declaring and demonstrating zero tolerance for discrimination, violence and harassment, gender-based harassment and sexual harassment and domestic violence, with impartiality, confidentiality, and respect for human dignity by taking immediate measures to protect those affected. It also undertakes not to hinder the receipt, investigation and management of such reports and complaints.

The Company is committed to providing assistance and access to any competent public, administrative or judicial authority, in the investigation of any incident of violence and harassment, gender-based harassment, sexual harassment or domestic violence.

With regard to employees and those associated with the Company in any way who violate the obligations arising from this Policy, the necessary appropriate and proportionate measures will be taken, depending on the circumstances, in order to prevent similar incidents or behaviour from recurring

The Company has established a comprehensive reporting, management and investigation mechanism, with the installation of special reporting channels and the creation of a framework of policies and procedures. With the aim of combatting discrimination, violence and harassment, this Policy reflects the Company's principles, by which it ensures the prevention and resolution of issues concerning violence and harassment at work. The individual procedures for the submission, handling and internal investigation of reports and complaints lay down the steps to be taken by any complainant, as well as the responsibilities of the administrative bodies of the Company and the actions they need to take to ensure effective management of the respective incidents.

5. MEASURES TO PREVENT, CONTROL, MITIGATE AND RESPOND TO RISKS AND TO MANAGE INCIDENTS OF DISCRIMINATION, VIOLENCE AND HARASSMENT - ACTIONS TO DISSEMINATE INFORMATION AND RAISE AWARENESS

All employees and those associated in any way with the Company are obliged to comply with this policy.

The policy applies both in workplaces and in places used for corporate meetings, conferences and events related to work, as well as to events and activities not directly related to it, either on the premises of the Company or outside, involving either a physical or online presence, or by telephone.

The Company aims to establish and encourage the maintenance of an accessible, safe and friendly working environment, where relationships between employees, associates, management are distinguished by mutual respect, courtesy, honesty, understanding, trust, cooperation and solidarity.

Within the framework of its capabilities, the provisions of the law and this policy, the Company takes every appropriate measure and makes all reasonable adjustments to working conditions in order to support and protect the jobs of employees who are victims of discrimination, violence and harassment, gender-based harassment, sexual harassment and domestic violence.

The Company works with the competent Occupational Physician to update and revise the Occupational Risk Assessment Study to include psychosocial risks, including risks of violence and harassment at work, and to prevent incidents of violence and harassment in the workplace. The Company takes all necessary measures to inform and raise awareness of its staff, using appropriate means to combat violence and harassment (including dissemination of printed and electronic materials, etc., organising targeted staff meetings to discuss the respective issues and address potential risks in a timely manner, holding seminars with mental health specialists or counselling services providers, representatives of voluntary organisations, etc., encouraging the participation of employee representatives and management executives in training programs and educational seminars on the recognition and management of risks of violence and harassment at work), ensuring that there is full awareness of the Company's policy and procedures in relation to incidents of violence and harassment, and also of the channels that should be used to make reports or complaints in the event of incidents or behaviour characterised by discrimination, violence and harassment, gender-based or sexual harassment, or domestic violence.

The Company trains its executives to recognise discrimination, violence and harassment, gender-based and sexual harassment at work, as well as domestic violence, and to provide the requisite support to its personnel and associates.

The Company encourages its employees and any third party associated with it in any manner to report incidents or behaviour that constitutes discrimination, violence and harassment, gender-based and sexual harassment in the workplace or domestic violence that they happen to witness. Within the context of the provisions of the law, its managerial rights, its current institutional and regulatory framework and this policy, the Company has the capacity to take any necessary measure and/or impose appropriate and necessary sanctions in the event that it is determined that any employee, customer, or visitor is responsible for behaviour that constitutes discrimination, violence and harassment, gender-based harassment, or sexual harassment in the workplace, including domestic violence.

6. INVESTIGATION AND HANDLING OF REPORTS AND COMPLAINTS

6.1 GENERAL PRINCIPLES

The Company has established appropriate mechanisms to conduct a fair, timely, thorough and objective investigation. All necessary measures have also been taken to ensure the cooperation of all parties involved, employees or third parties, in accordance with the procedure described below for the internal investigation of complaints by a special committee, the Complaint Reports Review Committee (hereinafter ‘the Committee’). The Company treats the handling of all reports and complaints regarding incidents of discrimination, violence and harassment, gender-based and sexual harassment in the workplace, including domestic violence, with the utmost confidentiality and discretion.

Reports and complaints of conduct in violation of this Policy will be accepted in writing, by name or anonymously, based on the provisions of the Policy and shall be promptly and thoroughly investigated.

Anonymous reports and complaints may be submitted by telephone or in writing by mail or e-mail. In all cases, the prerequisite is that the report is made ‘in good faith’, that is, the categorical belief in the correctness of the incidents reported.

Upon receipt of a complaint report, the Company ensures that:

- Confidentiality is respected and the identity of the person submitting the complaint report is protected in cases where the sender has not chosen to preserve their anonymity. Disclosure of the identity of the complainant may be required in judicial or other legal proceedings as part of an investigation by the competent authorities.
- Reports and complaints shall be disclosed only to persons deemed in advance to be necessary to the investigation of the case, who are bound by the nature of their duties to observe the rules of secrecy and confidentiality, and to protect personal data which may come to their attention in the exercise of their role. Persons who are the subject of the complaint report are thus protected until the examination of the true facts is complete.
- The person making the complaint report shall be adequately protected against potential negative consequences, such as, for example, acts of retaliation and/or reprisals, other discrimination or any form of unfavourable treatment, and no member of the Committee shall target the complainant. If any employee of the Company, or any third party associated in any way with it, considers that they have suffered retaliatory behaviour as a result of reporting or assisting the investigation of incidents of discrimination, violence and/or harassment, gender-based harassment, sexual harassment in the workplace and domestic violence, they should report the incident to the Human Resources Director of the Company, unless the retaliatory behavior pertains to the Human Resources Director, in which case the respective complaint report should be made to the Company’s General Manager, for the immediate reporting of said counterclaim incident, for the immediate reporting of the retaliation incident in question
- The person about whom the complaint report has been made, is on the one hand, protected from possible negative consequences, and on the other, no action is taken against them in the event that a violation is not proven. In addition, and in the event that, following an investigation, a violation is proven and measures are taken against the person, the Company undertakes to protect them from unintended negative

consequences, apart of course from any measures that may be taken by the Company and/or the competent authorities. In order to maintain workplace safety and the integrity of the investigation pending its outcome, the Company may inter alia and within the framework of the provisions of the law, transfer reporting or reported employees or modify their working hours. During this period, reporting or reported employees may not be permitted partial or full access to buildings and/or facilities.

In order to facilitate investigation and proper examination, complaint reports can indicatively include the facts that constituted discrimination, violence or any form of harassment, with reference to names, dates, locations and any witnesses and any other evidence.

It is clarified that it is not initially necessary for the complainant to provide material evidence to substantiate a complaint report with regard to the incidents of discrimination, violence, harassment, etc. However, it is recommended that all available information be reported in order to facilitate investigation of the case.

Persons who have submitted complaint reports will be notified of its receipt and receive progress reports on the review of their case at regular intervals, in accordance with the procedure described below. Upon completion of the investigation, the Company will communicate the outcome as soon as practicable and appropriate.

If the result of the investigation shows that an incident of discrimination, violence or harassment or retaliation has taken place, in exercising its managerial rights and in conjunction with the results of the review and taking any special and/or additional circumstances or facts into account, the Company shall at its free and absolute discretion, proceed in accordance with the provisions of its internal procedures and the applicable legal framework, to take appropriate corrective action and/or disciplinary measures and/or impose other sanctions and/or take other actions. The aforementioned actions as a whole may include but are not limited to the following: a) change of job position, hours, location or mode of employment; b) initiation of disciplinary proceedings; c) the imposition of other sanctions (such as termination of contracts of employment/salaried mandate/collaboration/project-based agreements)(in addition and independently of the abovementioned disciplinary control measures); d) judicial actions. In any given case, the offender may also be subject to criminal or civil liability, in accordance with applicable legislation.

This policy applies in parallel with the current general legislation on the protection of the personality of the employee and does not only impact the legal rights of the person affected at the level of civil and criminal legislation, but also their rights to file a report or complaint before any competent supervisory authority (the Ombudsman, the Labour Inspectorate, in writing or via the Citizen's Service Line at the telephone number 1555, for access to the direct psychological support and counselling service for women victims of gender violence through the SOS Line on the telephone number 15900, etc.). Any person responsible for receiving and managing these reports of complaints in accordance with the Policy, shall cooperate with any competent public, administrative or judicial authority which, either on its own initiative or at the request of the person affected and within the scope of its competence, asks for the submission of evidence or information, and shall undertake to offer assistance and access to the data.

To this end, any information they collect, in any form, shall be kept in a respective file in compliance with the provisions of Law 4624/2019 (Government Gazette, Series I, No 137).

6.2 INFORMAL PROCEDURE

If any employee of the Company, or a third party associated in any way with it, believes that they have suffered discrimination, violence or any form of harassment, or if it has been determined that such conduct has taken place in the workplace, and the person affected wishes to pursue an informal response to the incident, they are advised to follow the steps described below:

- Ask the person (or persons) who are creating the problem to put a stop to it.
- Present their complaint in writing to the person causing the problem.
- Ask a friend or colleague to speak to the person (or persons) on their behalf.

- Discuss the situation with his superiors or a member of the Human Resources Department and asks that an informal approach be made to the person (or persons) who are committing the infraction.

The Company encourages those affected to keep a record of all incidents, and of the actions they have taken to stop harassment, and details of any requests for help they have made.

6.3 STANDARD PROCEDURE REPORTING

If any employee of the Company or a third party associated in any way with them believes that they have suffered discrimination, violence or any form of harassment, or if they have found that such conduct is taking place in the work environment and they wish to formally address the issue, they should follow the steps described below to report a complaint regarding the incident. The written complaint report should be sent, for reasons related to ensuring independence, to the Human Resources Manager of the Company, who is responsible for informing the Members of the Committee. If the incident concerns the Human Resources Operations Manager, then the written complaint report should be sent to the General Manager. The complaint report is made to the Human Resources Department, as follows:

- By phone;
- By email;
- Letters by post should be addressed to the Human Resources Department(113, Orfeos Street, 11855 Athens), for the attention of the Company's Human Resources Director. If the incident concerns the Company's Human Resources Manager, the written complaint report will be sent to the General Manager of the Company.

If the incident concerns the General Manager of the Company, the written report and complaint shall be sent to the CEO of the Company.

Telephone complaint reports are recorded and submitted to the Committee by the Company's Human Resources Manager or to the General Manager (if the incident concerns the Human Resources Manager).

Access to information regarding complaint reports shall be granted exclusively to the competent officers, under the conditions described below, and solely for the purpose of handling the complaints reported.

In accordance with the foregoing, a special committee, the Complaint Reports Evaluation Committee (hereinafter 'the Committee'), is hereby set up to examine all reported incidents of discrimination, violence and harassment.

Especially and exclusively in the case of complaint reports concerning employees and the workplace of the Company, the Committee shall be composed of the Company's General Manager, the Financial Director and its Legal Advisor, and the General Manager of the Company shall preside over its meetings. The Human Resources Manager also takes part in the Committee's proceedings as Rapporteur, without voting rights. The duties of secretary to the Committee shall be exercised by an employee from the Human Resources Department. If the complaint report relates to any member of the Committee, or the rapporteur or the secretary, or if a member of the Committee (or the rapporteur or the secretary) should have a conflict of interest, then that member (or the rapporteur or the secretary) shall abstain from the meeting and shall be replaced by the head of another department appointed by the other members of the Committee, though this must not be the head of the department in which the complainant or the accused person works.

The Company's Human Resources Manager notifies the Committee regarding all complaint reports submitted. The Committee shall investigate any matter raised by any appropriate and expedient means. The Committee shall first decide whether the complaint report is based on facts that render further examination necessary and imperative. In the event that the complaint report is found to be manifestly unfounded, the Committee shall decide whether to retain the details on file.

Once the merits of the complaint report have been established, the Committee shall decide to take the necessary measures, as referred to in Chapter 6.1 hereof. The Committee should complete its investigation and reach a decision within fifteen (15) working days at the latest. Decisions shall be taken by majority vote, and shall be communicated directly to the person affected and to the accused. The Committee's decision as referred to above shall be binding and independent.

The persons responsible for investigating the matters in question may be granted access to the Company's records, audiovisual material collected by it, as well as any other appropriate means by which information and evidence may be obtained during evaluation of the complaint report and identification of complainants and accused persons.

The identity of all complainants shall be kept confidential to the extent practicable, in compliance with the rules of the GDPR.

When a complainant submits a report claiming alleged or actual misconduct, they must continue to comply with all contractual or other confidentiality obligations they have towards the Company.

In particular, for as long as an investigation by the Company is ongoing and in order to: a) ensure safe completion under the appropriate rules of confidentiality and objectivity; b) avoid concealment of critical evidence by the accused person or third party; and c) in the interests of avoiding any other adverse consequence, the reporting complainant shall refrain from engaging in any form of publicity regarding their complaint report, unless external reporting is required or otherwise permitted by applicable legislation.

7. MALICIOUS COMPLAINTS

Complaint reports which, in the context of the implementation of the procedures under this policy, prove to be manifestly malicious shall be deemed inadmissible and shall be further investigated at the discretion of the Committee, both as to the motives and the parties involved, in order to restore order by any lawful manner and means. In the context of this investigation, the Company may take any appropriate or necessary disciplinary or other measure against them or other person involved, or may impose any other sanctions in accordance with its current institutional and regulatory framework.

8. MORE INFORMATION - REFERENCE PERSONS

All questions related to the implementation or interpretation of this policy should be submitted to the Human Resources Manager, who is the designated person (specifically responsible for handling such requests), competent to offer information and advise personnel on issues related to the prevention and handling of incidents of discrimination, violence and harassment, harassment gender-based and sexual harassment in the workplace, including domestic violence. The role of the Reference Person is purely informational, and employees have access via email. It is the obligation of the said Reference Person, as well as any other person involved in the procedure (for example, the person receiving the complaint report, the Complaint Report Evaluation Committee, etc.), to protect personal data which may come to their attention in the course of their duties.

9. PROTECTION OF PERSONAL DATA - PRIVACY AND CONFIDENTIALITY

Any personal data obtained in the context of a complaint report and investigation in accordance with this procedure (of the reporting complainant, persons under investigation, and witnesses) shall be used exclusively for the purposes described in this procedure, and in accordance with the relevant legislation on the protection of personal data and the Company's Personal Data Protection Policy. Personal data will be deleted from the Committee's records twelve (12) months after the closure of the case, unless an extended retention period is required due to the nature of the allegations and/or the investigation.

Personal data shall only be disclosed to those who need to know, and shall be subject to a duty of confidentiality to the extent possible, it shall be compatible with the need to conduct an investigation and, if necessary, appropriate measures shall be taken. Exceptions to the above are possible in the event that the Company is obliged, by law and regulations, to disclose the data or if the report has malicious intent.