



POLICY AGAINST INCIDENTS OF VIOLENCE AND HARASSMENT IN THE WORKPLACE

KAVALA NOVAFERT LTD, demonstrating zero tolerance towards incidents of violence and harassment in the workplace, adopts the present policy, in compliance with articles 9 and 10 of Law 4808/2021, which ratified International Labour Convention 190/21.06.2021 of the International Labour Organization (ILO), concerning the elimination of violence and harassment in the workplace, the text of which was annexed verbatim to the law.

1. Purpose

The purpose of this policy is to create and establish a work environment that respects, promotes, and ensures human dignity and the right of every individual to a world of work free from discrimination, violence, and harassment. KAVALA NOVAFERT LTD declares that it recognizes, respects, and protects the right of every employee to a workplace free from violence and harassment and that it does not tolerate any such behaviour, of any form, from any individual.

2. Scope

This policy applies to individuals as per paragraph 1 of article 3 of Law 4808/2021, and within the scope of application and protection, it includes all employees and workers of any nature employed by KAVALA NOVAFERT LTD, regardless of their contractual status, including those employed under work contracts, independent services, fixed-term contracts, employees engaged through third-party service providers, individuals undergoing training, including interns and apprentices, volunteers, individuals whose employment relationship has terminated, individuals applying for employment, and other individuals transacting or collaborating with it.



3. Definitions and Examples

Violence and harassment: refers to forms of behaviour, acts, practices, or threats thereof, aimed at, leading to, or likely to result in physical, psychological, sexual, or economic harm, whether occurring individually or repeatedly.

Harassment: refers to forms of behaviour that aim at or result in the violation of a person's dignity and the creation of an intimidating, hostile, degrading, humiliating, or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment based on gender or other discriminatory reasons.

Gender-based harassment: refers to forms of behaviour associated with a person's gender, which aim at or result in the violation of that person's dignity and the creation of an intimidating, hostile, degrading, humiliating, or aggressive environment, as defined in Article 2 of Law 3896/2010 (A' 107) and Paragraph 2 of Article 2 of Law 4443/2016 (A' 232). These forms of behaviour include sexual harassment as defined in Law 3896/2010, as well as forms of behaviour associated with the sexual orientation, expression, identity, or gender characteristics of the person.

Discrimination: refers to the differential treatment of individuals stemming from prejudices or interests, any act that constitutes unjustifiable separation of individuals based on groups, classes, or other categories to which they belong or are perceived to belong. Indicatively, discrimination based on gender, age, language, nationality, race or ethnicity, disability, religious beliefs, or sexual orientation.

Incidents: The forms of behaviour prohibited by this policy include, but are not limited to: Insults based on discrimination regarding gender, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics and choices; threats, verbal or gestural; public or private insults; belittling or ridiculing an individual or their abilities, whether privately or in front of others; threatened or actual physical violence; persistent or unjustified criticism.



The offensive, malicious, derogatory, indecent, or mocking comments and their dissemination, insinuations, sexist or racist "jokes" and comments, the use of offensive language, verbal sexual harassment or propositions, insinuations that someone's sexual favours can advance their career or that refusing a sexual relationship may negatively impact their professional advancement in the Company, offering benefits (e.g., promotion or salary increase) in exchange for sexual favours or creating an environment that promotes "sexual contact" as a means for professional development in the workplace, retaliation or threats of retaliation following rejection of sexual propositions.

Cyberbullying, sending messages with harassing and offensive content via SMS, email, social media, fax, or letter, persistent or insulting questions without legitimate reason or cause about age, marital status, personal life, sexual orientation, as well as similar questions about race or ethnicity, including cultural identity and religion.

Also included are visual forms of harassment such as posters, animations, cartoons, photographs, or drawings that are derogatory based on characteristics protected by law. Unwanted physical contact such as touching, pinching, sexually suggestive gestures, hitting, grabbing, pushing, as well as all forms of physical violence. Invasion of privacy, intentional partial or total destruction of personal belongings, vehicles, or property, interference with or obstruction of normal work, movement, and physical integrity of the individual, physical exclusion or confinement, sexual gestures, physical surveillance, stalking.

The above actions are indicative and do not constitute an exhaustive list of prohibited actions.

Legitimate behaviour.

The following behaviours do not constitute instances of violence and harassment: Direct supervision of employees, including setting performance expectations. Taking corrective measures for performance, such as placing an employee on a performance improvement plan. Assigning tasks and providing guidance on how and when they should be completed. Requesting updates or progress reports on work. Approval or justified refusal of leave requests. Requesting documentation for absences due to health reasons based on applicable legislative provisions.



Moral or financial recognition of excellent employee performance. Providing constructive feedback on work performance.

4. Scope of Application- Determination of the Workplace

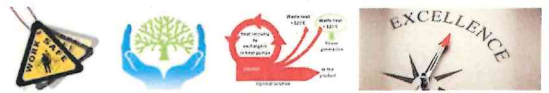
4.a. The workplace refers to a broader spatial framework where incidents of violence and harassment may occur. The above-mentioned forms of behaviour may take place in all facilities of the group of companies nationwide, where employees provide their services, as well as in areas where employees receive their pay, take breaks for rest or meals, in personal hygiene and care areas. Additionally, this policy applies to all types of commuting to and from work, other travel, conferences, training, as well as social events and activities related to work or associated with the company's actions. Finally, it applies to all forms of communication related to the company, including those conducted through informatics and communication technologies (e.g., emails, Zoom or Teams meetings, social media platforms, etc.).

4.b. Domestic violence – All acts of physical, sexual, psychological, or economic violence that occur within the family or household, regardless of biological or legal family ties, or between former or current spouses or partners, regardless of whether the perpetrator shares or shared the same residence as the victim in the past. Domestic violence conducted in the workplace, for example, through physical violence, sexual harassment, and stalking by current or former partners, constitutes a serious form of violence in the workplace. Acts of domestic violence, including stalking/surveillance, can also be perpetrated by individuals in the same work environment with whom they have (or had in the past) close relationships. Domestic violence, in any of the above forms, occurring against the employee during teleworking.

5. Assessment of risks of violence and harassment in the workplace

5.a. Assessment of risk factors and their improvement.

KAVALA NOVAFERT LTD studies the potential risk factors according to the nature and subject of the provided work, the psychosocial risks, among others, and the risks of violence and harassment



in the workplace, aiming to evaluate the existing working conditions and readjust them in a way that minimizes the chances of incidents of violence and harassment in the workplace as much as possible.

Indicative risk cases include: high stress in the workplace, isolated or confined workspaces, job distribution, facility safety and control, lack of adequate training, individuals with a history of violent behaviour, delivery of goods or services, individual or isolated work, late-night or early morning work, issues from domestic or personal life spreading into the workplace.

5.b. Organization of seminars, issuance of informational materials, and regular training of staff on issues of violence and harassment.

All employees must understand those behaviours that constitute violence and harassment, which are intolerable and condemnable. The designated person responsible for issues of violence and harassment will ensure that the staff receives appropriate awareness on these matters and will make this policy known within and outside the company.

6. Measures to prevent incidents of violence and harassment

6.a. Information on the rights of affected individuals.

KAVALA NOVAFERT LTD states that in case an individual is affected by an incident of violence and harassment during access to employment, during the course of the employment relationship, or even if the contract or employment relationship under which the incident or behaviour occurred has ended, they have the right to:

- a) judicial protection,
- b) recourse, filing a complaint, and requesting labour dispute resolution at the Labor Inspection, within its legal jurisdiction,
- c) report to the Greek Ombudsman, within the framework of its legal powers, as well as
- d) file a complaint within the company in accordance with the complaints management policy.



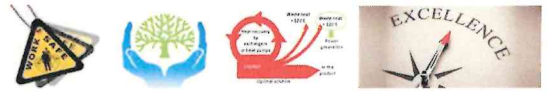
The individual procedures for submission, management, and internal investigation of reports include detailed steps that any complainant must follow, as well as the responsibilities of KAVALA NOVAFERT LTD's bodies and the actions they must take to ensure the effective management of relevant incidents. In any case, when a report or complaint of such behaviour arises within the company, the affected individual retains the right to appeal to any competent authority. Any employee who experiences domestic violence, which extends to the workplace, may orally or in writing report this fact to their supervisor to inform the company and take appropriate and necessary measures.

6.b. Actions of information, awareness, and support for staff.

KAVALA NOVAFERT LTD hereby informs its personnel and prominently displays the contact details of the competent administrative authorities to which every affected individual has the right to appeal (Labor Inspectorate, Greek Ombudsman), particularly informing about the SEPE (15512) hotline for complaints, as well as through the citizens' service hotline 1555 and the <https://1555.gov.gr/> website. Additionally, information is provided about the direct psychological support and counselling service for female victims of gender-based violence who can contact the SOS Line 15900 (General Secretariat for Family Policy and Gender Equality [G.S.F.P.G.E.]).

KAVALA NOVAFERT LTD, within its capabilities, takes every appropriate measure and makes every reasonable adjustment to working conditions to protect employment and support employees who are victims of domestic violence. Additionally, it takes all necessary measures to inform and raise awareness among staff, using appropriate means to combat violence and harassment, ensuring that everyone is aware of the company's policy and procedures regarding incidents of violence and harassment, knows where to turn in case of violence or harassment, and understands their legal rights.

KAVALA NOVAFERT LTD trains its staff in every appropriate manner and through various means to recognize discrimination, violence, and harassment in the workplace and to provide the necessary support to its personnel and partners. Furthermore, it encourages the participation of management personnel in training programs and educational seminars regarding the



identification and management of potential risks of violence and harassment. Additionally, it may conduct seminars with mental health professionals or counselling service providers.

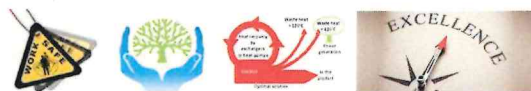
7. Procedure for Submission and Management of Internal Complaints- Reporting Person

Each employee against whom any incident of violence and harassment has occurred may submit an oral or written complaint to Mrs. IOANNOU STAVROULA (Legal Representative of the company), who is designated as the "reporting person" for this policy. The complaint must be submitted in person. The complaint cannot be made anonymously. The complaint should include the details of the accused person, i.e., the individual who engaged in prohibited behaviour, as well as specific incident(s) that substantiate it.

The reporting person thoroughly investigates each complaint and collects any necessary information regarding it. Complaints and investigations remain strictly confidential to the greatest extent possible, taking into account the sensitivity of the matter and the privacy of all parties involved.

Specifically, they may interview both the complainant and the accused, examine witnesses, request the submission of documents that may exist and provide evidence of whether any incidents of violence and harassment occurred, and communicate with the supervisors of each department if the complainant has addressed them.

Once the reporting person completes their investigation, they submit a written report to the company's management, detailing the outcome of the investigations. The results of the investigation are also communicated simultaneously to both the complainant and the accused, so they are aware of them. The completion of the investigation and the submission and communication of the findings by the reporting person must take place as soon as possible and, in any case, no later than 3 weeks from the date of submission of the complaint by the complainant.



In the event that an incident of discrimination, violence, harassment, or retaliation is indeed substantiated, the company's management takes, on a case-by-case basis, all necessary, appropriate, and proportionate measures against the accused.

These measures may include, but are not limited to:

- a) issuing a compliance warning,
- b) changing the job position, working hours, location, and manner of work provision,
- c) termination of the employment or collaboration contract with the company, subject to the prohibition of abuse of the right under Article 281 of the Civil Code.

Complaints that are found to be evidently malicious will be deemed inadmissible and will be further investigated at the company's discretion, both in terms of motives and individuals involved, in order to restore order through legal means and measures.

8. Rights of the affected parties

According to current legislation, any individual who experiences an incident of violence and harassment has the right to leave the workplace for a reasonable period without loss of pay or other adverse consequences if, in their reasonable belief, they face an imminent serious risk to their life, health, or safety, especially when the employer is the perpetrator of such behaviour or fails to take appropriate measures to restore workplace peace, or when such measures are insufficient to stop the behaviour of violence and harassment.

In this case, the departing individual is obliged to inform the designated person in advance, reporting the incidents of violence and harassment and the circumstances justifying their belief that there is a serious risk to their life, health, or safety.

Employees facing incidents of violence and harassment at work have the right to resort to the competent authorities, as stipulated by law (a. right to judicial protection, b. right to lodge a



complaint and file a request for labour dispute resolution with the Labor Inspection, within the framework of its statutory powers, c. reporting to the Greek Ombudsman, within the framework of its statutory powers).

9. Obligation of Impartiality and Confidentiality

The designated person is required to act objectively and impartially during the investigation process of the complaints. Additionally, they must behave with respect towards all involved parties and in a confidential and discreet manner. The disclosure or communication to non-involved parties of any information regarding the investigated complaint is strictly prohibited. These obligations also apply to the Management of the company during the final stage of decision-making and actions.

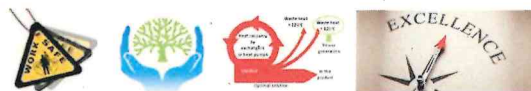
10. Prohibition of Retaliation- Victimization of the complainant

Retaliation and victimization of the complainant, who, as an affected party, asserted their rights and filed a complaint regarding an incident of violence and harassment, are prohibited. Retaliation and victimization of the complainant constitute a serious violation of this policy and result in consequences for the perpetrator. If any employee or third party associated with the company in any way believes they have been subjected to retaliatory behaviour due to reporting a complaint or assisting in the investigation process of incidents of discrimination, violence, and/or harassment, they must follow the above procedure to report the incident of retaliation.

11. Cooperation with administrative and judicial authorities

KAVALA NOVAFERT LTD, along with any competent individual or service for receiving and managing such complaints at a corporate level, cooperate with any competent public, administrative, or judicial authority, which, either ex officio or upon request from an affected party, within its competence, seeks the provision of information and commit to providing assistance and access to the data. For this purpose, any data collected, in any form, are kept in a

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relevant file, in accordance with the provisions of Law 4624/2019 (A' 137) "Personal Data Protection Authority, measures for the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data."

For further information regarding this policy, any interested party may contact Mrs. IOANNOU S. (Legal Representative of the company).

ATHENS, 24/4/2024

S.IOANNOU

LEGAL REPRESENTATIVE