



AVAX A.E.

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ATHENS MARINA SA

HUMAN RIGHTS PROTECTION POLICY

Respect for human rights is a fundamental principle for the AVAX Group. This Policy reflects the AVAX Group's commitment to implementing the applicable legislation and key international principles on human rights, promoting respect and protection of these rights. At the same time, it ensures that people within the Group's internal environment and its sphere of influence are treated fairly and with dignity. Maintaining a safe working environment with equal opportunities, free from discrimination or harassment is a key priority for the Group.

In cases where human rights violations are identified, the Group is committed to taking immediate remedial actions and preventing any adverse impacts resulting from the violation.

BASIC PRINCIPLES OF HUMAN RIGHTS PROTECTION

Terms and Conditions of Employment

The Group is committed to maintaining a work environment of mutual respect, meritocracy, transparency and mutual trust, protecting the standard of living and well-being of its employees. In this context, it respects the national legislation of each country in which it operates regarding the minimum wage and fully complies with all applicable laws on wages and working hours.

Respect for diversity and combating workplace violence and harassment in line with policies.

Health and safety at work

The Group is committed to providing and maintaining a safe and healthy workplace, focusing on preventing and minimising accident risks, injuries and exposure to health hazards, with the sole ultimate goal of achieving zero accidents, in accordance with the Policy.

Child protection

The Group respects the rights of children, including the right to the protection and care necessary for their well-being, their right to education, to rest and to freedom of expression. In this context, the Group shall not employ workers below the minimum age limit required by the legislation of the countries in which it operates.



Prohibition of forced labour

The Group prohibits the use of all forms of forced labour, including any form of human trafficking.

Freedom of association and collective bargaining

The Group adheres to the legal requirements of the applicable legislation on the right to freedom of association and collective bargaining, ensures that employees participating in trade unions do not face intimidation or harassment and fosters constructive dialogue with duly elected employee representatives, with mutual respect and good faith.

Personal Data Protection

The protection of personal data is a fundamental priority and concern throughout the Group. In this context, necessary measures are taken to comply with the provisions of the General Data Protection Regulation (EU) 2016/679, Law 4624/2019, and the applicable legislation and provisions for the protection of personal data, as well as the Group's Personal Data Protection Policy.

Collaboration with local communities

The Group acknowledges that it is part of the local communities in which it operates, respects the rights and needs of their residents, maintains open channels of communication with local stakeholders and keeps them informed about their concerns related to Human Rights, aiming to enhance its positive socioeconomic footprint by implementing actions to meet local needs, providing relief in emergency situations, and creating jobs.

Relations with Suppliers

The Group encourages its Suppliers to adopt and respect the principles and requirements of this Policy and expects them to comply with all the Group's commitments related to human rights, as well as to ensure that any third parties with whom they work on behalf of the Group, also comply with these commitments.

REPORTING COMPLAINTS OR POLICY VIOLATIONS

Any potential violations of this Policy or incidents of non-compliance with the applicable legislation can be reported either to the following e-mail address ethics.avaxgroup@avax.gr, managed by the Company's Human Resources Department, or via a dedicated online platform, accessible from a visible location on the Company's website, which includes clear instructions for using the platform and submitting complaints and violations.

The Group is committed to investigating any reports, ensuring that reporting parties do not suffer any retaliation or acts of retribution due to their report, and taking immediate corrective actions to address any impacts due to identified human rights violations.



FINAL PROVISIONS

The Group evaluates and monitors adherence to this Policy in its activities, as well as its effectiveness in safeguarding the human and labour rights of its employees, suppliers, partners and subcontractors, as well as the local communities residents where it operates.

This Policy applies complementarily and does not supersede any other Company policies on related matters, including but not limited to (a) the Company's Code of Ethics and Conduct, (b) the Company's Policy on combating workplace violence and harassment, and (c) the Anti-Bribery Policy.

This Policy, as currently in force, is communicated to the Group's employees and its key points are posted on the Group's website (www.avax.gr).