



POLICY
ON COMBATING VIOLENCE AND HARASSMENT AT WORK (Mobbing)
AND
POLICY ON THE MANAGEMENT OF INTERNAL COMPLAINTS OF VIOLENCE AND HARASSMENT

AVAX S.A.
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The company adheres to all measures and obligations related to the implementation of Law 4808/2021 for the prevention and addressing of all forms of violence and harassment, including gender-based violence and harassment, and sexual harassment, as currently in effect.

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 person to a work environment free from violence and harassment. The Company states that it acknowledges and respects the right of every employee to a work environment free from violence and harassment and that it shall not tolerate any such behaviour, of any form, by any person.

A. Scope

1. This policy applies to and concerns all employees and personnel in the Company, regardless of their contractual status, including salaried employees, those working under project contracts, independent service providers, salaried mandate holders, individuals employed through third-party service providers, as well as trainees, including interns and apprentices, volunteers, employees whose employment relationship has ended, as well as job candidates and applicants.

2. The forms of violent and harassing behaviour against any of the above persons may take place particularly:

a) at the workplace, including public and private spaces and areas where the employee provides work, receives remuneration, takes breaks, especially for resting or eating, in personal hygiene and care areas, changing rooms, or accommodation provided by the Company.

(b) during commuting to and from work, other trips, travel, training, as well as work-related events and social activities; and

(c) during work-related communications, including those carried out by means of information and communication technologies.

Prohibition of workplace violence and harassment

All forms of violence and harassment occurring during work, whether related to or arising from work, including violence and harassment based on gender, religion, race, sexual orientation and sexual harassment, are prohibited.

B. PREVENTION AND COMBATING WORKPLACE VIOLENCE AND HARASSMENT

1. Risk Assessment of Workplace violence and harassment



2. Measures to prevent, control, mitigate and address the risks of workplace violence and harassment and to monitor such incidents or forms of behaviour

The Company takes measures and implements practices to prevent, control, mitigate and address the risks of workplace violence and harassment and to monitor such incidents or forms of behaviour.

Indicatively, such measures and administrative practices include the following:

- a) Adopting a Policy for the Handling of Internal Complaints of Incidents of Violence and Harassment, which is included herein, so that any complaint or related report is received, investigated and resolved in a confidential manner and in a way that respects human dignity and ensures the protection of the complainant. The Company may keep an Incident Book for the reported incidents.
- b) Appointing a reference person ("Liaison") for guiding and informing employees regarding the prevention and addressing of workplace violence and harassment, a designated person for receiving complaints or grievances from affected individuals about violent or harassing behaviours ("Receiving Officer"), as well as a three-member committee for examining, investigating and managing the aforementioned complaints or grievances ("Complaints Investigation Committee").
- c) Encouraging the maintenance of a work environment where respect for human dignity, cooperation, and mutual assistance are core values.
- d) Implementing technical measures, such as ensuring adequate lighting, among others.
- e) Training employees on the procedures for handling incidents of violence and ensuring that employees receive the necessary training/information to carry out their duties, particularly in positions with a higher risk of violence and harassment incidents.
- f) Carrying out actions to raise employee awareness on healthy behaviour standards, as well as issues concerning vulnerable categories of employees.
- g) Providing guidance and support to victims of violence and harassment for their reintegration into the workplace.
- h) Providing assistance to any competent public, administrative or judicial authority during the investigation of violence or harassment incidents, upon their request.
- i) Evaluating on a regular basis the effectiveness of the preventive and mitigation measures implemented and revising/updating the risk assessments and measures.
- j) Any other appropriate and suitable measures to achieve the objectives of this policy.

3. Actions for informing and raising awareness among personnel on issues of violence and harassment

4. Information on the rights and obligations of employees and the Company in the event of an incident occurring or being reported or complained about, as well as on the related procedure.

4.1. Options for those affected by incidents of violence and harassment:

4.1.1. In the event that a person believes that they are affected by an incident of violence and harassment while accessing employment, during the course of their employment relationship or collaboration with the Company, or even if their contract or employment relationship with the Company under which the incident or behaviour allegedly occurred has ended, they have:

- a) the right to file a report or complaint within the Company in accordance with the procedure for receiving and managing complaints as specified in Part C of this Policy. In any event, when a report or complaint of



such behaviour arises within the Company, the affected person shall retain all rights to appeal to any competent authority;

- b) the right to file an appeal, a complaint and request the resolution of a labour dispute with the Labour Inspectorate, within the scope of its statutory competencies;
- c) the right to file a report to the Ombudsman, within the framework of its statutory competencies as the body promoting and supervising the principle of equal treatment; and
- d) the right to judicial protection.

4.1.2. Furthermore, any person covered by this policy who suffers from an incident of violence and harassment against them has the right to leave the workplace for a reasonable period of time, without loss of salary or any other adverse consequence, provided that, in their reasonable belief, there is an imminent serious danger to their life, health or safety, in particular where the perpetrator of such behaviour is a person exercising managerial authority or representing the Company, or when the Company fails to take necessary and appropriate measures to restore workplace peace, or when such measures are not sufficient to cease the behaviour of violence and harassment. In this case, the person withdrawing must inform the Receiving Officer in writing beforehand, detailing the incident of violence and harassment and the circumstances justifying their belief of imminent serious danger to their life, health or safety. If the danger does not exist or has ceased to exist and the affected person refuses to return to the workplace, the Company may appeal to the Labour Inspectorate with a request to resolve the dispute, applying in this regard the provisions of Article 18 of Law 4808/2021, as applicable.

4.2. Contact details of the competent administrative authorities to which any affected person has the right to appeal

a) **Hellenic Labour Inspectorate (SEPE)**: The contact details of Regional Directorates of Labour Relations Inspectorates are available at the following link: [Contact - Labour Inspectorate \(hli.gov.gr\)](https://hli.gov.gr)

SEPE complaints hotline via the citizens' helpline: 1555

b) **Ombudsman**: 17 Chalkokondyli, 10432 Athens, Greece, E-mail: press@synigoros.gr Tel: (+30) 213 1306 600

c) Direct psychological support and counselling service for women victims of gender-based violence: SOS line 15900.

4.3. Consequences of non-compliance with this policy within the context of the employment relationship

The provisions specified in Part C hereof shall apply.

5. Designation of a reference person ("Liaison")

The designated contact person ("Liaison") for the purposes of this policy is Irini Grous, who can be contacted by phone at 2106375566 or via email at: ethics.avaxgroup@avax.gr.

In this capacity, the Liaison is only responsible for guiding and informing the persons covered by this policy on the prevention and treatment of violence and harassment at work, whether or not they are addressed to it on the basis of an incident or a complaint of an incident of violence and harassment. The Liaison shall ensure the protection of Personal Data (PDP) which may come to their knowledge in the performance of their role.

6. Protecting employment and supporting employees who are victims of domestic violence by any appropriate means or reasonable adjustments.



C - PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS

1. Contact details for receiving complaints ("Receiving Officer")

The person responsible for receiving complaints or grievances of the affected individuals regarding behaviours of violence or harassment ("Receiving Officer") is the current Chief Human Resources Officer of the parent Company AVAX S.A. Grievances or complaints may be submitted to the Receiving Officer via a special online platform, accessible from a visible location on the Company's website, which includes clear instructions on how to use the platform and submit grievances and complaints. Alternatively, complaints may be made either verbally (in person or by telephone at 2106375591), or by sending a postal letter to the Chief Human Resources Officer of the parent company AVAX S.A. at the address: 16 Amarousiou - Chalandriou Avenue, 15125 Maroussi, Attica, marked "personal and confidential".

The Receiving Officer shall ensure the unhindered receiving of any complaint about incidents of violence or harassment and shall ensure that the persons who submit complaints are informed about the receipt of the complaint, its investigation progress, and its outcome.

The Receiving Officer may, (a) archive the complaints or grievances if they are incomprehensible or do not contain facts that constitute an incident of violence or harassment, or (b) refer complaints or grievances to the appropriate body, responsible for investigating the violation within the Company, if they concern a violation that does not fall within the scope of this Policy, or (c) if the complaint or grievance is deemed credible based on this Policy, refer them for investigation to the Complaints Investigation Committee, as specifically outlined in C.(2) of this Policy.

2. Investigation and examination of complaints by the Complaints Investigation Committee

Complaints and grievances about incidents of violence or harassment referred by the Receiving Officer to the Complaints Investigation Committee shall be examined and investigated by this Committee with impartiality, objectivity and respect for human dignity, as specified outlined in this article:

a) The Complaint Investigation Committee consists of an independent Advisor, a Member of the Board of Directors of the parent company AVAX S.A., the respective Chair of the Officer of the parent company AVAX S.A. If the complaint or grievance is directed against a member of the Complaints Investigation Committee, or if any member of the Complaints Investigation Committee is found to have a conflict of interest, then such member shall be removed from the recipient list for the specific complaint or grievance, shall not participate in its investigation, and shall be replaced ad hoc by a person appointed by the CEO of the Company. The decisions of the Complaints Investigation Committee shall be reasoned and taken by majority vote.

b) The Complaints Investigation Committee, assisted, if deemed appropriate or necessary, by other competent Company officials, proceeds to investigate the complains, using any appropriate means, provided that this is not contrary to the law and good morals. Furthermore, if deemed appropriate or necessary, the Complaints Investigation Committee shall inform the Company's management (Board of Directors and/or CEO) about the complaint and the progress of the related investigation.

c) If possible, the Complaints Investigation Committee seeks to resolve the incident in a conciliatory manner to avoid escalation.

d) To ensure workplace peace and the integrity of investigations, the Company, upon the recommendation of the Complaints Investigation Committee to the Company's CEO, may, among other actions, relocate the affected individual or the accused, or modify their work schedule, location or method of work provision until the investigation is completed.

e) During the examination of the complaint and for the verification of the allegations, the Complaints Investigation Committee may access Company records, audio-visual material collected by the Company, and other appropriate means for gathering information and evidence.

f) Before recommending any measures or imposing any sanctions to the Chief Executive Officer, the Complaints Investigation Committee shall summon the accused to present their defence, unless it reasonably believes that this is not necessary, either because it would endanger the affected individual, or because there is irrefutable evidence as to whether or not the act constituting an incident of violence and harassment was committed, or for any other reason.



g) If the incident also constitutes an illegal act and entails criminal or administrative sanctions, the Complaints Investigation Committee collaborates with the competent authorities (indicatively and not limited to judicial, prosecutorial, SEPE, Ombudsman, etc.).

h) The Complaints Investigation Committee records the results of the investigation and, based on these, recommends to the CEO of the Company a) either to conclude the procedure and archive the complaint or grievance or b) to take appropriate measures to address the reported violation, so that the CEO can take the necessary decisions.

i) The Company, the Receiving Officer and the members of the Complaints Investigation Committee are committed to the maintaining confidentiality and protecting the Personal Data collected during the performance of the aforementioned duties.

3. Prohibition of retaliation against the affected person.

The Company is committed to adhering to the obligation to prohibiting retaliation against affected persons, in accordance with Law 4808/2021 and labour law provisions. In this context, among other things, any unfavourable treatment of the affected individual is prohibited if it constitutes vindictive behaviour or retaliation against them for filing a complaint about an incident of violence and harassment.

4. Consequences of violations of this policy

In the event that it is found that an employee or another person employed by the Company has infringed the prohibition of violence and harassment, the Company shall take the necessary, appropriate and proportionate measures against them, as the case may be, in order to prevent a similar incident or behaviour from recurring. Such measures may include:

- a) the compliance recommendation;
- b) the imposition of disciplinary penalty, applying in this regard the relevant provisions of the Company's Work Regulations and/or the Company's Code of Ethics & Conduct, as currently applicable;
- c) the change of position, working hours, location or method of providing work, whether on a temporary or permanent basis; or
- d) the termination of the employment or cooperation relationship, without prejudice to the prohibition of abuse of right under Article 281 of the Civil Code.

Furthermore, in the event that the complaint is proven to have been submitted maliciously, the Company reserves the right to take all legal actions within the framework of the employment or cooperation contract and the law.

5. Cooperation and provision of any relevant information to the competent authorities, if requested.

The Company, the Receiving Officer, the Complaints Investigation Committee, and any other person responsible for receiving and handling complaints of violence or harassment shall cooperate with any competent public, administrative or judicial authority which, either ex officio or upon request from an affected individual, requests the provision of data or information within its competence, and are committed to providing any assistance and facilitating access to such data.. To this end, any collected information, in whatever form, shall be kept in a relevant file, subject to the provisions of personal data protection legislation.

D. FINAL PROVISIONS

This policy shall be communicated to all employees of the Company by any appropriate means and is posted in workplaces, on the Company's internal communication network and on its website and is transmitted to Group companies for incorporation with the necessary adjustments for each company.