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Date of Certifying: **22.12.2025**

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**POLICY FOR THE PREVENTION AND COMBAT OF VIOLENCE AND  
HARASSMENT IN THE WORKPLACE  
&  
FOR THE SUBMISSION AND MANAGEMENT OF INTERNAL  
COMPLAINTS REGARDING INCIDENTS OF VIOLENCE AND  
HARASSMENT**

## **Preamble**

The company adheres to all measures and obligations concerning the implementation of the provisions of Part II 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.

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 world of work free from violence and harassment. It also aims to create, maintain, and promote a climate of high-standard human relations, mutual trust, and good cooperation, mutual respect among persons associated with the company, as well as adherence to necessary rules of conduct, hierarchy, ethics, safety, and comfort in the provision of services and work.

The company declares that it recognizes and respects every employee's right to a work environment free from violence and harassment and that it does not tolerate any such behavior, of any form, from any person. Specifically, the company does not tolerate any form of harassment, bullying, workplace psychological abuse, aggressive or unjustified behavior, offensive, annoying, and generally unwanted behavior against any employee or other person protected by this policy, by a supervisor, colleague, or third party. Any employee or associate who is a recipient or witness of such incidents must immediately inform the persons designated in this policy. The company's management ensures the discreet, confidential, and effective handling of these issues.

This policy is adopted pursuant to Articles 9 and 10 of Law 4808/2021 and the regulatory legislation implementing them and covers the persons referred to in paragraph 1 of Article 3 of Law 4808/2021, as specified below.

## **Scope of Application**

The persons covered by the scope and protection of this policy are all employees and workers of the company, regardless of their contractual status. Specifically, it covers every employee with a contract or relationship of dependent work, full-time or part-time or rotational employment, indefinite or fixed-term, as well as those employed under a work contract, independent services, salaried mandate, those employed through third-party service providers, individuals undergoing training, including interns and apprentices, volunteers, as well as employees whose employment has ended, and individuals seeking employment. For the purposes of implementing this policy, forms of violent and harassing behavior against the aforementioned persons can occur particularly: (a) at the workplace, including public and private spaces where the employee provides work, receives remuneration, takes breaks especially for rest or meals, in areas of personal hygiene and care, changing rooms, or accommodations provided by the company, (b) during commutes to and from work, other commutes,

travel, training, as well as events and social activities related to work, and (c) during communications related to work, including those conducted through information and communication technologies.

### **Definitions and Examples**

**"Violence and harassment"** refers to forms of behavior, actions, practices, or threats thereof, aimed at, leading to, or potentially leading to physical, psychological, sexual, or economic harm, whether manifested individually or repeatedly.

**"Harassment"** refers to forms of behavior that aim to 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, including harassment based on gender or other grounds of discrimination.

**"Gender-based harassment"** refers to forms of behavior connected to a person's gender, which aim to or result in the violation of that person's dignity and the creation of an intimidating, hostile, degrading, humiliating, or aggressive environment according to Article 2 of Law 3896/2010 (A' 107) and paragraph 2 of Article 2 of Law 4443/2016. These forms of behavior include sexual harassment under Law 3896/2010, as well as behaviors connected to sexual orientation, expression, identity, or gender characteristics of the person.

**"Sexual harassment"** refers to any form of unwanted verbal, psychological, or physical behavior of a sexual nature that violates the dignity of the individual.

- It may take the form of unwanted touching, offensive and/or sexual comments, coercion, exertion of power/authority, or include unwanted sexual propositions, unwanted sexual contact, unwanted verbal or physical behavior of a sexual nature, unwanted invitations for sexual compliments, and other unwanted physical, verbal, or visual behavior of a sexual nature and/or behavior directed at someone due to their gender.
- Unwanted physical, verbal, or visual behavior of a sexual nature may include any of the following types of behavior: explicit sexual propositions, sexual innuendos, comments, adjectives, or defamatory expressions with sexual implications, "teasing" or "jokes" of a sexual nature, sexual humor, obscene gestures, or obscene expressions, images or designs with obscene or sexual implications, display of sexually offensive graphic materials not necessary for work, physical contact such as "light taps," pinches, or touches.

Harassment on any basis exists whenever, for example, the following occur:

- Submission to harassing behavior that constitutes an explicit or implicit term or condition for employment,

- Submission to or rejection of the behavior is used as the basis for an actual or implied decision regarding employment, including job loss, demotion, or changes in responsibilities or benefits,
- The behavior aims to or has the effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Other unlawful harassment constitutes any behavior that creates a work environment characterized by offensive, obscene, or derogatory comments and includes, among others, the following:

- Racist or derogatory comments based on ethnicity,
- Receiving, posting, displaying, publishing, photographing, printing, distributing pornographic, obscene, offensive, or inappropriate materials or materials of sexual, ethnic, religious, or racist nature,
- Use of offensive humor, including racist, ethnic, religious, or sexist jokes,
- Derogatory comments regarding gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or any other legally protected characteristic of another person,
- Any communication or action that is harassing or discriminatory.

### **Prohibition of all forms of violence and harassment**

All forms of violence and harassment, manifested during work, whether connected to it or arising from it, including gender-based violence and harassment and sexual harassment, are expressly prohibited.

The company is committed to providing a work environment free from discrimination, intimidation, and unlawful harassment. Harassment is a form of discrimination that is offensive, affects the performance of employees/partners, jeopardizes the integrity of the company's relationship with its employees/partners, and harms the productivity and stability of the company. Specifically, harassment based on gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or other legally protected characteristic will not be tolerated and is prohibited by this policy.

### **Diversity and Inclusion**

The company develops and maintains a diverse workforce that provides a stable competitive advantage. It recognizes that a diverse mix of backgrounds, skills, and experiences leads to new ideas, products, and services. This maximizes the company's ability to achieve its goals.

### **Prohibition of Discrimination**

The company is committed to providing equal employment opportunities and does not accept any form of unfair discrimination at any stage of the employment relationship, such as during candidate attraction, hiring, training, payroll, and promotions.

In this context, any form of direct or indirect discrimination based on gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or other legally protected characteristic is prohibited.

Specifically, discrimination in terms of remuneration is prohibited. All employees of the company are entitled to equal pay for similar work or work of equal value. The company guarantees that the professional classification system for determining remuneration is based on common criteria for all employees and is enforced in a way that excludes discrimination.

In the design and implementation of personnel evaluation systems linked to salary progression, the company guarantees adherence to the principle of equal treatment and does not permit any form of discrimination.

### **Promotion of Substantial Equality at Work**

The company promotes substantial equality at work to ensure: equal pay for work of equal value, balanced participation of women and men in managerial positions or professional and scientific groups formed within the company, equality in professional development, adherence to labor laws regarding maternity protection and parental leave, compliance with laws regarding measures to prevent and address violence and harassment, implementation of equality plans or other innovative measures to promote substantial gender equality, and establishment of a corporate culture that discourages sexism and gender discrimination.

## **I. PREVENTION AND COMBAT OF VIOLENCE AND HARASSMENT AT WORK**

### **Assessment of Violence and Harassment Risks at Work**

The company recognizes that any harassment leading to the creation of an intimidating, hostile, and offensive environment often manifests in workplaces and has intense and negative consequences, primarily for individuals who are direct recipients, but also for those indirectly involved in related incidents (e.g., witnesses).

It also acknowledges that violence and harassment at work intensify work-related stress and lead to psychosocial risks. Psychosocial risks and work-related stress are among the greatest challenges in

occupational safety and health. They significantly affect individuals' health and the smooth functioning of businesses.

The company recognizes that psychosocial risks arise from problematic design, organization, and management of work, as well as from an unhealthy social work environment, and may lead to negative psychological, physical, and social outcomes, such as work-related stress, burnout, or depression. When psychosocial risks and stress are treated as organizational issues rather than personal weaknesses, they can be managed just as effectively as any other safety and health risk in the workplace.

In light of the above, the company periodically assesses and investigates the risks of violence and harassment at work to prevent the occurrence of any phenomena of violence and harassment.

For this purpose, the company updates the Occupational Risk Assessment Study to include the evaluation of psychosocial risks, specifically those related to violence and harassment, including sexual harassment, to take appropriate measures for their prevention, control, and limitation. For the development of a preventive action program and improvement of working conditions in the company, psychosocial risks are considered as a distinct parameter.

In the Psychosocial Risk Assessment Study, risks associated with violence and harassment are identified, taking into account, among other things, any inherent dangers stemming from the nature of the activity, the job position, factors such as gender and age, or other characteristics that constitute grounds for discrimination.

#### **Measures for the prevention, control, limitation, and handling of incidents of violence and harassment in the workplace and for monitoring such incidents or forms of behavior**

- The company adopts the following measures and commits to implementing the administrative practices listed below for the prevention and control of risks related to violence and harassment:
- Encourages all employees/partners to maintain a work environment where respect for human dignity, cooperation, and mutual assistance are core values.
- Ensures open communication with management, direct supervisors, and colleagues.
- Establishes a specific procedure for managing reports/complaints, as detailed in the corresponding chapter of this policy.
- Receives, investigates, and manages every complaint or related report, demonstrating zero tolerance for violence and harassment, with confidentiality and in a manner that respects human dignity. Follows every prescribed procedure, respecting the principle of confidentiality and the protection of the personal data of those involved.

- Ensures the unobstructed receipt, investigation, and management of complaints or reports. Provides assistance and access to every competent public, administrative, or judicial authority during the investigation of such incidents or behaviors, if requested by them.
- Ensures that employees have the necessary training/information to perform their duties.
- Organizes actions to raise employee awareness of healthy behavior patterns and issues concerning vulnerable categories of employees.
- Guides and supports victims of violence and harassment, as well as victims of domestic violence, for their reintegration into the workplace, using every appropriate means or reasonable accommodation.
- Cares for the training of employees in the procedures for managing incidents of violence.
- Oversees the proper implementation of health and safety measures for employees.
- Develops a program of preventive action and improvement of working conditions in the enterprise, taking into account, in particular, the organization of work, social relations, environmental and technological factors, as well as psychosocial risks.
- Evaluates psychosocial risks, including the risks of violence and harassment, including sexual harassment, and takes the appropriate measures for their prevention, control, and limitation.
- Evaluates regularly the effectiveness of the preventive measures and response measures implemented and revises/updates the risk assessment and measures.

### **Actions for Staff Information and Awareness**

The company declares its zero tolerance towards incidents of violence and harassment and adopts the following categories of actions to raise staff awareness about these phenomena.

Specifically, the company commits to providing staff with information and details in accessible formats, as appropriate, regarding the risks of violence and harassment, as well as related prevention and protection measures, the procedures existing at the company level, and the legal options available in case of such incidents.

The company and the individuals exercising managerial authority or representing it:

- Provide employees with information related to potential risks of violence and harassment in the workplace and related prevention and protection measures, including the obligations and rights of employees and the employer concerning such incidents.
- Post and make accessible information in the workplace regarding the procedures existing at the company level for reporting and addressing such forms of behavior, as well as contact details for the competent administrative and judicial authorities according to current regulations.

As part of raising staff awareness, the company, among other actions:

- Organizes targeted staff meetings to discuss related issues and timely address potential risks.
- Holds seminars with mental health professionals or advisory service providers, representatives of volunteer organizations, etc.
- Encourages the participation of employee representatives and management staff in training programs and educational seminars concerning the recognition and management of risks of violence and harassment in the workplace.

In the context of information on health and safety issues at work:

- The company ensures that employees receive all necessary information regarding safety and health risks, as well as protection and prevention measures and activities concerning the company in general or any type of job position and duties, including risks and measures to combat violence and harassment in the workplace, including sexual harassment.
- The occupational physician informs employees about the risks arising from their work and ways to prevent them, including risks of violence and harassment, including sexual harassment.

### **Rights and Obligations of Affected Employees/Partners**

Every employee/partner of the company who is affected by an incident of violence and harassment against them, even if the relationship under which the incident or behavior occurred has ended, has the following rights:

- Right to judicial protection.
- Right to appeal, file a complaint, and request the conduct of a labor dispute at the Labor Inspectorate, within the scope of its legal competencies.
- Right to report to the Ombudsman, within the scope of its legal competencies, as an authority for promoting and supervising the principle of equal treatment.
- Right to file a complaint within the company according to this policy. In any case, when a report or complaint of such behavior arises within the company, the affected person retains every right to appeal to any competent authority.

Every affected person can also contact:

- The Labor Inspectorate, through the citizen service line 1555.
- The immediate psychological support and counseling service for women victims of gender-based violence, through the SOS line 15900.

Every person who experiences an incident of violence and harassment has the right to leave the workplace for a reasonable time without loss of salary or other adverse consequences, provided that



they reasonably believe there is an imminent serious danger to their life, health, or safety, until measures are taken to stop the behavior of violence and harassment.

In this case, the departing person must inform the company in writing beforehand, mentioning the incident of violence and harassment and the facts justifying their belief that there is an imminent serious danger to their life, health, or safety. If the danger does not exist or has ceased to exist and the person refuses to return to the workplace, the company may appeal to the Labor Inspectorate requesting the resolution of the dispute.

In any case, the violation of the prohibition of violence and harassment at work creates, among other things, a claim for full compensation for the affected person, covering both actual and consequential damages, as well as moral damages.

Furthermore, any termination or dissolution of the legal relationship on which employment is based, as well as any other adverse treatment of the affected person, is prohibited and invalid if it constitutes retaliatory behavior or a countermeasure for reporting an incident of violence and harassment.

### **Obligations of the Company and its Competent Authorities in Case of an Incident, Report, or Complaint of Violence and Harassment**

The company and the individuals exercising managerial authority or representing the company, to the extent and degree of their responsibility, are obliged to initiate the prescribed procedure for managing and addressing incidents of violence and harassment as soon as they become aware of any incident, without undue delay, as this procedure is provided in the corresponding chapter of this policy.

When an employee or another person employed violates the prohibition of violence and harassment, the company is obliged to take the necessary appropriate and proportional measures against the accused, as defined in the corresponding chapter of this policy, to prevent and not repeat a similar incident or behavior.

### **Definition of Reference Person**

The person designated as the reference ("liaison") at the company level, responsible for guiding and informing employees/partners about the prevention and handling of violence and harassment at work, is the company's Compliance Specialist.

The role of the reference person is informational: it involves guiding and informing employees/partners, regardless of whether they approach them due to an incident or complaint about violence and harassment or not. Employee access to the reference person will be easy and direct, specifically through the telephone line: 6936-789204.

In any case, it is the obligation of the aforementioned person to protect Personal Data (PD) that may come to their knowledge during the exercise of their role.

Additionally, the company has established an internal notification system (ETHICS LINE) for all its employees and third parties. This internal notification system is accessible to everyone and allows them to report/complain in good faith, either by name or anonymously, any concerns about behaviors or practices that may violate this Policy. Reports/complaints can be sent through the specially designed electronic platform: <https://servier.whispli.com/ethicsline>, which operates on the company's website: [www.servier.gr](http://www.servier.gr).

### **Protection of Employment and Support for Employees/Partners Who Are Victims of Domestic Violence**

The company, demonstrating its social responsibility towards the phenomenon of domestic violence, adopts the following measures:

- Protection of the employment of victims of domestic violence through any appropriate means or reasonable accommodation.
- Provision of special leave or flexible work arrangements upon request by the employee/partner who is a victim of domestic violence, to support them in maintaining their employment and smoothly reintegrating after such incidents, particularly in cases where there are minor children or children with disabilities or serious illnesses.

## **II. PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS**

The company establishes a special procedure regarding the stages of reporting issues of protection from harassment and violence. This procedure outlines the immediate measures that must be taken in case of protection issues. Within this framework, a special complaint-reporting mechanism is established to identify and report problems and violations of relevant legislation, ensuring: a) immediate communication and access to the person responsible for receiving the report, and b) appropriate support and legal assistance when needed.

### **General Principles**

Complaints, reports, and allegations of harassment or violence are handled promptly with seriousness and complete confidentiality. All employees are obliged to maintain full confidentiality if they provide information as part of an investigation of a complaint.

Commenting on confidential information or spreading rumors is not tolerated. All employees are protected from victimization, adverse treatment, and detrimental changes in conditions because they

contributed in any way (e.g., complaint, testimony) to the investigation of complaints of violence, harassment, or sexual harassment.

### **Main Involved Persons in the Procedure – Specially Authorized Personnel**

- The affected person who submits a complaint/report/allegation.
- The Compliance Specialist, as the "liaison" at the company level.
- The company's Human Resources Director, responsible for receiving and managing related complaints/reports/allegations.
- The immediate supervisor of the person submitting the report (if the affected person chooses to involve them).
- The legal representative of the company.

### **Receiving Complaints/Reports/Allegations**

Complaints/reports/allegations of acts of violence or harassment or retaliation that violate this policy will be accepted in writing or orally through the aforementioned communication channels. Even anonymous complaints will be taken seriously and investigated.

Any employee/partner who observes an incident of violence, sexual harassment, or other illegal harassment must report it immediately to the aforementioned responsible persons.

Any supervisor or director who observes an incident of violence or potential sexual or other illegal harassment must immediately inform the company's "liaison."

Every affected person has the right to submit complaints/reports/allegations to their immediate supervisor. If the complaints are directed against their immediate supervisor, the affected person may address the next level of supervisors. However, due to the seriousness of issues of violence or harassment or sexual harassment, the affected person may bypass the hierarchy and report directly to the company's "liaison." Therefore, although it is recommended that affected persons first seek help from their immediate supervisor, they can, at any time, report the issues that concern them through any reporting channel.

The affected person has the right, after contacting the aforementioned communication channels, if not satisfied with the handling of the issue and the solution provided, to submit complaints/reports/allegations directly to the company's management.

## **Investigation and Examination of Complaints with Impartiality and Protection of Confidentiality and Personal Data of Victims and the Accused**

The Compliance Specialist and every responsible person of the company are committed to receiving and not obstructing the receipt of, investigating, and promptly managing every such complaint, examining the allegations with impartiality and respect for human dignity, and taking immediate measures to protect the affected person.

In any case, it is the commitment of the aforementioned persons or services to maintain confidentiality and protect Personal Data (PD) collected during the exercise of the aforementioned duties.

All complaints/reports/allegations will be quickly and thoroughly investigated by the company's "liaison" or other responsible persons assigned to investigate such complaints/reports/allegations.

The aforementioned responsible persons have access to company files, audiovisual material collected by the company, and other appropriate means for collecting information and evidence during the examination of the complaint and determining the allegations. In any case, appropriate organizational measures are taken to ensure the security of the aforementioned information and the confidentiality.

Respecting the principles of confidentiality and personal data protection is essential. A secure procedure for exchanging information between involved employees/interested parties is followed. Data protection and confidentiality cover the tasks and investigations conducted under this policy and continue after its completion. The applicable legislation regarding privacy and personal data protection is strictly adhered to.

### **Main Complaint Examination Procedure**

#### **Stage 1 - Initiation of Complaint Investigation:**

When responsible persons receive a complaint about an incident of violence or harassment or sexual harassment, they proceed with the following procedure:

- Recording the date, time, and facts of the incident.
- Determining the views of the affected person.
- Confirming that the affected person understands the company's procedures for handling the complaint.
- Discussing and agreeing with the affected person on the next steps for investigating the complaint.

- Respecting the choice of the affected person.
- Maintaining a confidential record of all discussions.
- Maintaining confidentiality and protecting Personal Data (PD).
- Informing the affected person about their ability, at any stage of the process followed within the company, to also file a complaint with the competent administrative authorities within their jurisdiction (Labor Inspection and Ombudsman) as well as judicial authorities, at their discretion.
- Providing immediate attention and support to the affected person. If medical and psychological evaluation and support are needed, it should be provided immediately. Informing the occupational physician to provide urgent treatment.

## **Stage 2 - Communication with Involved Persons and Examination of Evidence:**

Subsequently, the responsible persons conducting the investigation discuss with the involved persons and examine the relevant evidence. The investigation of the incident is conducted with confidentiality and objectivity. Specifically:

- Discuss separately with the affected person and the accused.
- Discuss separately with other relevant third parties (e.g., witnesses of the incident of violence or harassment).
- Examine audiovisual material, email messages, documents, and any other appropriate evidence for examining the complaint and determining the allegations.

## **Stage 3 - Evaluation and Decision Making:**

The responsible individuals conducting the investigation, based on the above data, assess the validity of the complaint. In this context, they must try to understand what has happened and ascertain the actual facts in the most objective, impartial, and direct manner possible.

Following the above evaluation, they prepare an investigation report of the complaint, detailing the investigations, testimonies, and findings, while recording the conclusion of the investigation.

The relevant conclusion, accompanied by the corresponding proposals for further actions by the company, is submitted to the company's legal representative.

The legal representative, in collaboration with the company's "liaison" and the respective responsible person who conducted the investigation, makes the decision regarding the company's action plan (this may include, depending on the case, further protective actions in a safe and appropriate manner, reporting to local authorities, initiating disciplinary procedures, etc.).

Specifically: (a) If the conducted investigation cannot substantiate the validity of the complaint, the case is archived. Nevertheless, organizational measures may be taken at the company level to ensure the smooth operation of the business and achieve labor peace. The affected person is

informed again about their ability to submit a complaint to the competent administrative authorities within their jurisdiction (Labor Inspection and Ombudsman) as well as to judicial authorities, at their discretion. (b) If the conducted investigation substantiates the validity of the complaint, meaning the reported incident of violence, harassment, or sexual harassment did occur, the procedure prescribed by the current policy is followed against the harasser, and appropriate organizational measures are taken to protect the affected person. The company monitors that the recommendations and generally taken measures are implemented, that the harassing behavior has ceased, and that the affected person is satisfied with the outcome. In this case as well, the affected person is informed again about their ability to submit a complaint to the competent administrative authorities within their jurisdiction (Labor Inspection and Ombudsman) as well as to judicial authorities, at their discretion.

The company maintains a confidential record of all actions taken to handle each case, assures the involved parties that all records related to the matter are kept confidential, and ensures that the process is completed as quickly as possible and in any case within a reasonable time from the submission of the complaint.

#### **Reporting to competent authorities:**

In case of submission of particularly serious reports or complaints, the legal representative, in collaboration with the company's "liaison" and the Human Resources Director, may decide to submit a relevant report to the competent administrative authorities, seeking their advice. The company is committed to following the advice and implementing the measures proposed by the above administrative authorities. Depending on the case, judicial proceedings and/or other legal procedures may be initiated.

#### **Prohibition of retaliation against the affected person:**

In any case, the company is committed to adhering to the obligation of prohibiting retaliation, according to Article 13 of Law 4808/2021 and the applicable provisions of labor law.

Specifically, the termination or any other dissolution of the legal relationship on which employment is based, as well as any other adverse treatment of the affected person, is prohibited and invalid if it constitutes retaliatory behavior or countermeasure under the meaning of Article 14 of Law 3896/2010, for incidents of violence and harassment.

### **Consequences upon Identification of Violations:**

When the conducted investigation reveals that an employee or someone engaged in another form of employment has violated the prohibition of violence and harassment, the company takes the necessary, appropriate, and proportional measures against the reported individual to prevent and ensure that similar incidents or behaviors do not recur.

These measures may include: (a) Compliance recommendation, changing the position, schedule, location, or method of work provision of the reported individual. (b) Initiating disciplinary proceedings and imposing disciplinary sanctions as provided by the company's Internal Work Regulations, if the reported individual falls within its scope. Specifically, for violations of this Policy, the company's Management, through its designated bodies, imposes one of the following disciplinary penalties depending on the severity of the offense:

- Oral or written warning.
- Reprimand.
- Fine up to 25% of the daily wage or 1/25 of the monthly salary. Fines withheld from employees are deposited where the law specifies.
- Mandatory leave from work for up to ten days per calendar year for the same employee. During this leave, the employment contract is suspended, not terminated. An appeal against the mandatory leave penalty can be filed within five days of its notification to the employee before the competent Regulations Service of the Ministry of Labor, according to Article 2 of Legislative Decree 3789/57, as amended. This appeal has a suspensive effect. (c) Termination of the employment or cooperation relationship with the reported individual, subject to the prohibition of abuse of rights under Article 281 of the Civil Code. It is noted that termination can occur regardless of whether or not disciplinary proceedings are initiated.

### **Cooperation and Provision of Relevant Information to Competent Authorities, if Requested:**

The company, as well as any responsible person or service for receiving and handling such complaints at the business level, cooperates with any competent public, administrative, or judicial authority that, either ex officio or upon request from the affected individual, within its jurisdiction, requests the provision of data or information and commits to providing assistance and access to the data (paragraph 1 of Article 5 of Law 4808/2021). For this purpose, any data collected, in any form, is maintained in a relevant file in compliance with the provisions of Law 4624/2019.

### III. FORMULATION AND IMPLEMENTATION OF THIS POLICY

This policy is formulated following the notification of employees and posting of the policy draft in the workplace or its communication, in order to gather the opinions of all personnel, as there are no trade unions or employee councils within the company.

Within this framework, employees can, within ten (10) days from the posting of this policy as a draft, submit proposals for its content regarding each specific regulated issue, including, but not limited to, the rights and obligations of individuals in cases of incidents of violence and harassment within the employment relationship, the procedures for informing, receiving, and investigating complaints, as well as identifying areas or work arrangements that due to their characteristics pose a higher risk of violence and harassment, taking into account the nature and specifics of the business and the nature of the provided services, and groups of individuals who may be more exposed to such risks, with the aim of taking measures for their effective protection.

After the ten-day period from the posting of this policy as a draft, within which employees can submit their proposals as mentioned above, the content of this policy is finalized.

The adoption of this policy is completed with notification actions by the company, by posting it in the workplace, on the company's announcement board, and on the company's website, if available, along with informing employees and their representatives, in writing, or by email, or by any appropriate means.

The company will evaluate the effectiveness of this policy and make necessary amendments. For this purpose, it may collect anonymous statistical data and information regarding its implementation to assess its effectiveness. This policy may also be revised if required for the company's compliance with legal and regulatory mandates.

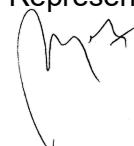
In case of amendments to the policy texts, the company has the same obligation to inform employees and their representatives as during the initial adoption.

This policy comes into force ten (10) days after its posting on the company's announcement board and after its communication by any appropriate means to the individuals subject to it, at which point their knowledge of it is presumed.

This policy must be permanently posted in accessible and visible places in the workplaces and is publicly posted on the company's website so that all interested parties can be aware of it.

**For the company,**

The Legal Representative



Estève Sylvain Speranza