

ANNEX A

to the Rules of Procedure
of the company KAPACHIM SA

**Policy on prevention and combating of
violence and harassment in the workplace and
management of internal complaints
of violence and harassment cases**



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This policy was prepared by KAPACHIM SOCIETE ANONYME, with TIN 094134978 (hereinafter referred to as the Company) pursuant to the provisions of Law 4808/2021 and was posted to the work areas - Announcements board of the company. In case of amendments, they will be registered and disclosed to the personnel.

The Company has zero tolerance for cases of violence and harassment in the workplace, adopts this policy, in compliance with Articles 9 and 10 of Law 4808/2021, which ratified the International Labor Convention 190/21.06.2021 of the International Labor Organization (ILO), regarding the elimination of violence and harassment in the workplace, text of which was attached to the text of Law.

1. Purpose

The purpose of this policy is to create and establish a working environment which respects, promotes and assures human dignity and the right of each individual to a working environment free from discriminations, violence and harassment. The Company states that it acknowledges, respects and protects the right of each employee to a working environment free from violence and harassment and that it shall not tolerate any such behavior, of any kind, by any individual.

2. Scope of application - Applicable individuals

This policy includes the individuals of Article 3 (1) of Law 4808/2021 and in the scope of its application and protection all types of employees of the Company are included, regardless of their contractual scheme, including employees under a work contract, independent services, salaried mandate, third party service providers, individuals receiving training, including trainees and apprentices, volunteers, individuals whose work relationship has expired, individuals applying for a job and other individuals who trade or cooperate with the company.

3. Prohibited forms of conduct - Definitions

Violence and harassment: "Violence and harassment" means the forms of conduct, actions, practices or threats thereof which aim, lead or may lead to psychical, psychological, sexual or financial harm, either occurring individually or repeatedly,

Harassment: "Harassment" means the forms of conduct which have the purpose or result in the violation of dignity of the individual and creating an intimidating, hostile, degrading, humiliating or offensive environment, regardless if they constitute a form of discrimination, and include harassment based on gender or other discrimination reasons,

Harassment based on gender: "Harassment based on gender" means the forms of conduct connected to the gender of an individual which have the purpose or result in the violation of the dignity of that individual and creating an intimidating, hostile, degrading, humiliating or offensive environment according to Article 2 of Law 3896/2010 (A 107) and Article 2 (2) of Law 4443/2016

(A' 232). These forms of conduct include sexual harassment of Law 3896/2010, as well as forms of conduct connected to sexual orientation, expression, identity or gender features of the individual.

Discrimination: “Discrimination” means the different treatment of people which occurs from prejudices or interests, each action that unreasonably segregates individuals based on groups, classes or other categories in which they belong or are considered to belong. Indicatively, discrimination based on gender, age, language, nationality, race or ethnic origin, disability, religious beliefs or sexual orientation.

Instances: The forms of conduct prohibited by this policy shall include, but not be limited to: Insult due to discrimination based on gender, race, religion, appearance, sexual orientation, disability, age or other personal characteristics and choices, threats, verbal or hand signals, cursing publicly or privately, devaluation or ridicule of an individual or their skills, either privately or before third-parties, threatened or actual physical violence, persistent or unjustified criticism. Abusive, malevolent, demeaning, defamatory or mocking comments and their spreading, innuendos, sexist or racist “jokes” and comments, use of offensive language, oral sexual harassment or proposals, comments that sexual favors of a certain someone can promote their career or that turning down a sexual relationship can negatively affect their professional course in the Company, providing benefits (e.g. promotion or wage increase) in return for sexual favors or the creation of an environment promoting “intercourse” as a means for the professional development in the workplace, acts of retaliation or threats for retaliation after the rejection of sexual proposals. Online bullying, sending messages with harassing and insulting content via SMS, e-mail, social media, fax or letter, persistent and/or insulting questions without any legitimate reason regarding age, marital status, personal life, sexual orientation, as well as similar questions regarding the race or nationality, including the cultural identity and religion. Visual forms of harassment such as posters, animated films, cartoons, photographs or drawings that are derogatory based on the characteristics protected by the law are also included. Unwanted physical contact such as touching, pinching, gestures of a sexual nature, tapping, grabbing, pushing as well as any type of physical violence. Violation of privacy, intended total or partial destruction of personal objects, vehicles or assets, interference or obstruction of normal work, movement and physical integrity of the individual, physical blockade or imprisonment, sexual gestures, physical tracking, stalking. The above acts are indicative and do not constitute an exclusive list of prohibited acts.

Fair behavior

The following behaviors do not constitute cases of violence and harassment. The direct supervision of employees, including the determination of the performance expectations. Taking measures to improve performance, such as placing an employee in a performance improvement plan. Assignment of tasks and guidance on the manner and the time they must be completed.

Request for updates or performance reports. Approval or justified refusal of leave. Request for the documentation of absence due to health issues based on the legislative provisions. Moral and financial reward for the excellent performance of an employee. Provision of constructive comments in relation to the performance of work.

4. Scope of application - Determination of the Workplace

4.a. Workplace means the wider geographical scope, in which cases of violence and harassment may take place. The above forms of conduct may take place in every facility of the company all over Greece, in which the employees provide their services, as well as in those spaces where the employees receive their remuneration, take breaks to rest or eat, in personal hygiene and care spaces. Also, this policy includes any kind of transportation to and from the workplace, other transportation, traveling, conferences, training, as well as social events and activities related to the job or connected to the activities of the company. Finally, it applies to any kind of communications related to the company, including those that take place through information and communication technologies (e.g. e-mails, zoom or teams meetings, social media etc.).

4.b. Domestic violence - Every act of physical, sexual, psychological or financial violence taking place within the family or residence, regardless of biological or legal family ties, or between former or current spouses or partners and regardless of whether the perpetrator shared or not the same residence with the victim in the past. Domestic violence committed in the workplace, for instance through physical violence, sexual harassment and stalking from current or former partners, is a serious form of violence in the workplace. Acts of domestic violence, including stalking/tracking, may also be committed by persons in the same work environment with whom they have (or had in the past) close relations. Domestic violence, under any of the above-mentioned forms, exercised against the employee during remote working.

5. Violence and Harassment risks assessment at work

5.a. Assessment of risk factors and their improvement

The Company studies the possible risk factors in cooperation with all its departments and the competent occupational physician depending on the nature and the object of the job provided, psychosocial risks, among others violence and harassment risks in the workplace, in order to evaluate existing work conditions and adjust them in a way that limits as much as possible the possibilities of a case of violence and harassment taking place in the workplace.

Cases of risk are mentioned indicatively, such as: high stress in the workplace, isolated or closed workplaces, allocation of job positions, facilities security and their control, lack of proper training, individuals with a history of violent behavior, delivery of goods or services, individual work or isolated space, late at night work or during the morning hours, domestic or personal life issues expressed in the workplace.

5.b. Organization of seminars, issuance of brochures and regular personnel training in matters of violence and harassment

Every employee must understand the conduct that constitutes violence and harassment, that is unacceptable and prohibited. The competent reference person on violence and harassment cases will ensure that the personnel receive proper awareness on violence and harassment issues and will disclose this policy within and outside of the company.

6. Prevention measures for violence and harassment cases

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

The Company states that in case an individual is affected by a violence and harassment event during their employment, during the employment relationship or even if the contract or work relationship, in the context of which the incident or the conduct occurred, has expired, they have:

- a) the right to judicial protection,
- b) the right to appeal, submit a complaint and apply for a labor dispute to the Labor Inspectorate, in the context of its legal competence,
- c) the right to report to the Ombudsman, in the context of its legal competence, as well as
- d) the right to submit a complaint within the company according to the complaint management policy.

The procedures of submission, management and internal investigation of complaints include detailed steps which the complainant must take, as well as the responsibilities of the company bodies and the actions they must make to ensure the efficient management of the relevant incidents. In each case, when a report or complaint related to such a conduct arises within the company, the affected individual reserves every right to appeal to every competent authority. Each employee, who suffers domestic violence which extends to the workplace, may orally or in writing report the incident to their supervisor in order for the company to be informed and take the proper and necessary measures.

6.b. Information, awareness and personnel support actions.

The Company with the present informs the personnel and keeps at a visible location the details of the competent administrative authorities to which every affected individual has the right to appeal (Labor Inspectorate, Ombudsman), and in particular informs them about the complaints hotline of the Labor Inspectorate Body (SEPE) (15512) but also the citizen service hotline 1555 and <https://1555.gov.gr/>, as well as the mental health support and advisory service for women victims of gender-based violence that they can communicate with the SOS Helpline 15900 (General Secretariat for Family Policy and Gender Equality).

The Company, within the framework of its capabilities, takes every appropriate measure and makes every reasonable adjustment to the working conditions for the protection of the

employment and the support of the employees - victims of domestic violence. Also, it takes every necessary measure to inform and bring awareness to the personnel, using the above-mentioned appropriate measures, as the case may be, to combat violence and harassment, ensuring that everyone is aware of the policy, know to whom they can address in a case of violence or harassment, as well as their options provided for by the law.

The Company trains its officials in any appropriate way and means in order to recognize discriminations, violence and harassment in the workplace and provide the required support to the personnel and its partners. Also, it promotes the participation of the administration officials to training programs and educational seminars related to the recognition and management of potential violence and harassment risks, and it may also carry out seminars with mental health professionals or consulting service providers.

7. Procedure for the Submission and Management of Internal Complaints - Contact person

Each employee who was subjected to any case of violence and harassment, may submit an oral or written complaint to **TILEMACHOS KALOZYMIS** (the Human Resources Manager of the Company) who is appointed as the “contact person” for this policy. The complaint may be submitted in person or via e-mail to **tkalozimis@kapachim.com**. The complaint may not be anonymous. The complaint must indicate the details of the accused party, i.e. the person that conducted a form of prohibited conduct, as well as a specific incident that proves it. In case the perpetrator of the harassment is the reference person, competent for the treatment of the incident shall be Mr. KAVADAS DIMITRIOS (CEO of the Company) to whom the complaint may be submitted in person or via e-mail to **dkavadas@kapachim.com**.

The contact person investigates every complaint thoroughly and collects any necessary information in relation to it. Complaints and investigations remain strictly confidential to the maximum extent possible, taking into consideration the sensitivity of the case and the privacy of those involved.

In particular, it may communicate with the accused party and the complainant, examine witnesses, request the submission of documents that may exist and which prove whether any case of violence and harassment took place and communicate with the manager of each department in case the complainant addressed the matter to them.

When the contact person completes the investigation, it submits a written report to the Administration of the company which records the results of the investigation. The results of the investigation are disclosed both to the accused party and the complainant at the same time in order to have knowledge of them. The completion of the investigation and the submission and disclosure of the conclusion of the contact person must take place as soon as possible and in any case not later than 3 weeks from the submission of the complaint by the complainant.

-In case there is an actual incident of discriminatory treatment, violence or harassment or act of retaliation, the Administration of the company proceeds to all necessary, appropriate and relevant measures against the accused party, as the case may be.

Such measures may include, indicatively:

- a) a recommendation of compliance,
- b) change in the work position, working hours, workplace and method that they provide their work,
- c) termination of the work contract or cooperation with the company, without prejudice to the prohibition of abusing the right provided for by Article 281 of the Civil Code.

-Complaints proven to be obviously malicious action will be considered inadmissible and will be further investigated according to the opinion of the company, both in terms of motive and in terms of those involved in order to restore the order with every legal way and means.

8. Rights of the affected individual

In accordance with the applicable legislation, each individual that suffered an incident of violence and harassment has the right to leave the workplace for a reasonable period, without being deprived of their salary or suffering any other adverse consequence, provided that, in their reasonable belief, there is a serious risk for their life, health or security, especially when the employer is the perpetrator of such conduct or when the necessary appropriate measures do not take place in order to restore the working peace, or when the measures are not capable to stop the violent and harassing conduct.

In this case, the leaving party is obliged to previously inform the reference person in writing, mentioning the case of violence and harassment and the incidents that justify their belief, that there is a serious risk for their life, health and security.

The employees suffering cases of violence and harassment in the workplace have the right to appeal before the competent authorities, as required by the legislation (a. right to judicial protection, b. right to appeal and submit a complaint and apply for a labor dispute to the Labor Inspectorate, in the context of its legal competence, c. the right to report to the Ombudsman, in the context of its legal competence).

9. Obligation of non-discrimination and secrecy

The reference person shall be obliged to act in an objective and impartial manner during the investigation procedure of the complaints. Additionally, it must respect all parties involved in a confidential and discrete manner. Publication or disclosure of data regarding each complaint under investigation to parties not involved shall be fully prohibited. The above obligation shall

also burden the Administration of the company during the final stage of taking measures and decisions.

10. Prohibition of acts of retaliation - Victimization of the complainant

Acts of retaliation and victimization of the complainant who, as an affected individual, claimed their rights and submitted a written complaint regarding a case of violence and harassment shall be prohibited. Acts of retaliation and the victimization of the complainant shall constitute a serious violation of this policy and shall carry consequences to the individual acting in this manner. If any employee or third party that is connected in any way with the company considers that they have been subjected to acts of retaliation due to the submission of a complaint or the provision of assistance in the investigation procedure of discrimination, violence and/or harassment, must follow the above procedure for reporting of such act of retaliation.

11. Cooperation with administrative and judicial authorities

The Company, as well as any competent person or service for the reception and management of such complaints at a company level cooperate with every competent public, administrative or judicial authority, which, either automatically or after the submission of a request by the affected individual, in the context of its competence, requests the provision of data or information and are bound to provide assistance and access to the data. For this purpose, any data collected, in any form, are kept in the relevant file subject to the provisions of Law 4624/2019 (A' 137) "Data Protection Authority, measures for implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data".

For more information regarding this policy, any interested individual may contact Mr. TILEMACHOS KALOZYMIS (Human Resources Manager of the Company)

For the Company

Dimitrios Kavadas
CEO