

POLICY AGAINST DISCRIMINATION, VIOLENCE AND HARASSMENT IN THE WORKPLACE

1. Purpose of the Policy

The Company is committed to ensuring a working environment that respects, promotes, and protects human dignity, equal treatment, and every individual's right to work in conditions of safety, respect, and professionalism.

This Policy aims to:

- prevent and eliminate all forms of discrimination, violence, harassment and bullying,
- promote a culture of respect, equality, and inclusion,
- ensure equal opportunities and fair treatment,
- protect employees from incidents of verbal, physical, psychological, or sexual harassment,
- comply with applicable labour and anti-discrimination legislation.

The Company applies a zero-tolerance policy against:

- discrimination,
- violence,
- harassment,
- sexual harassment,
- bullying / mobbing,
- and any inappropriate or offensive behaviour.

This Policy is adopted in accordance with:

- Law 4808/2021,
- Law 4443/2016,
- Law 3896/2010,
- applicable labour legislation,
- as well as the principles of human rights protection and equal treatment.

2. Scope of Application

This Policy applies to:

- all employees regardless of employment status,
- management and executive staff,
- job applicants,
- partners, suppliers, and subcontractors,
- as well as any person cooperating or interacting with the Company.

The Policy applies:

- during recruitment,
- throughout employment,
- during training activities,
- during evaluations,
- in professional changes or assignments,
- during meetings, travel, and work-related communications,
- as well as after the termination of the employment or cooperation relationship, where applicable.

3. Prohibition of Discrimination and Harassment

The Company prohibits any form of direct or indirect discrimination based on:

- gender,
- age,
- race or ethnic origin,
- religion or beliefs,
- marital or family status,
- disability or health condition,
- sexual orientation,
- gender identity or expression,
- political or social beliefs,
- or any other characteristic protected by law.

The following are not tolerated under any circumstances:

- verbal or physical violence,
- psychological pressure,
- sexual harassment,
- bullying,
- threats,
- offensive or degrading behaviour,
- exclusion or unequal treatment.

4. Prevention and Protection

The Company:

- assesses risks related to violence, harassment, and discrimination in the workplace,
- implements preventive and protective measures,
- enhances employee awareness and training,
- promotes healthy standards of professional conduct,
- encourages mutual support and respect.

Within this framework:

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- awareness and training activities are organised,
- the effectiveness of the implemented measures is evaluated,
- appropriate organisational and technical measures are applied to protect employees.

The Company is also committed, where possible, to supporting employees who are victims of domestic violence through appropriate and reasonable accommodations.

5. Reporting and Handling of Incidents

The Company encourages the good-faith reporting of:

- incidents of violence or harassment,
- incidents of discriminatory treatment,
- inappropriate or unprofessional behaviour,
- violations of this Policy.

All reports:

- are examined promptly and impartially,
- are handled confidentially,
- are investigated with respect for human dignity,
- are protected against any form of retaliation.

The Company ensures safe and accessible communication channels for submitting reports or complaints, in accordance with its internal complaint handling procedures.

6. Rights of Affected Persons

Any person who believes they have been the victim of discrimination, violence, or harassment has the right:

- to submit an internal report or complaint,
- to request support and guidance,
- to seek recourse before the competent administrative or judicial authorities,
- to be protected from adverse treatment or retaliation.

7. Measures in Case of Violation

In the event that a violation of this Policy is confirmed, the Company shall take appropriate and proportionate measures, which may include:

- recommendation for compliance,
- reassignment of position or duties,
- change of working hours or work arrangements,
- disciplinary actions,

- termination of the employment or cooperation relationship,
- as well as any other lawful measure deemed necessary.

8. Compliance and Continuous Improvement

Compliance with this Policy is mandatory for all employees and partners of the Company.

Management is committed to:

- monitoring the implementation of the Policy,
- continuously strengthening the culture of respect and equal treatment,
- taking corrective and preventive actions where required,
- ensuring a safe, fair, and inclusive working environment for all.