

<b>Corporate Policies</b>	Code No:
Policy against discrimination, violence & harassment at the workplace	Valid from: 01.03.2022
Corporate Standard	Revision No: 01
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# Policy against discrimination, violence & harassment at the workplace

For Frigoglass Services S.A. employees

Issued by: Head Office HR

Approved by: M. Souliotis, Group HRD

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## Revision History

Date	Rev. No.	Description of Revision	Revision Author	Approved by
28/04/2023	01	Change of company name following employee transfer (HIVE DOWN)	Flora Vintzileou, HR Manager HO & WE	Manolis Souliotis, Group HR Director
18/10/2023	01	New Frigoglass Logo		

### 1. Purpose

To create and safeguard a working environment free of discrimination, violence and harassment ensuring respect and protection of human dignity for all employees.

### 2. Scope

Applicable to all Frigoglass Services S.A. employees at any level and employment status (i.e. permanent, short-term, part -time, interns).

### 3. Definitions

- **Discrimination:** Prejudice or unfairness based on grounds of gender, race, color, nationality, ethnic or social origin, genetic characteristics, language, religion or belief, political opinion, disability or health status, age or sexual orientation.
- **Harassment & Violence:** Behaviors, acts, practices, or threats that aim, result in, or are likely to result in physical, psychological, sexual, or economic harm. Harassment also refers to behaviors that aim or result in violating the dignity of an employee, creating a threatening, hostile, undignified, humiliating, dehumanizing or offensive environment, whether they constitute a form of discrimination or not.
- **Retaliation:** Actions of revenge by an employee or third party against another employee or third party, who opposes to violence or to any form of harassment, making a complaint, testifying, or participating in any incident investigation process.

### 4. Declaration of zero tolerance of discrimination, violence and harassment, and enforcement of regulatory laws

FRIGOGLASS Services S.A. declares that we recognize and respect every employee's right to work in an environment free of discrimination, violence and harassment, and we will not tolerate any such misconduct, in any form and by any person.

FRIGOGLASS Services S.A. complies with all measures and obligations relating to the implementation of Law No. 4808/2021 Part II provisions on the prevention and combating of all forms of discrimination, violence, and harassment, including gender-based violence and sexual harassment.

This policy is adopted in accordance with Articles 9 and 10 of Law No. 4808/2021 and the regulatory legislation pursuant thereto, and covers the persons referred to in Article 3 (1) of Law No.4808/2021.

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## 5. Methods towards preventing and combating discrimination, violence, and harassment at the workplace

### 5.1 Assessment of discrimination, violence, and harassment risks at the workplace

(Included in the Company's existing Occupational Risk Assessment Study)

Employee's exposure to situations such as discrimination, violence and harassment at workplace may create an intimidating or hostile, environment, that could result in physical, psychological, sexual or financial harm, violation of personal dignity, as well as stress, reduced performance and productivity.

### 5.2 Actions & procedures to prevent, control, alleviate and address such risks, as well as monitor such incidents

- Embracing as corporate core values the importance of safety at the workplace, the respect of human dignity, and the respectful cooperation.
- Supporting and promoting the corporate ethical standards set via Company **Code of Business Conduct**.
- Promoting and safeguarding employees' well-being via **Human Rights Policy**.
- Encouraging open communication with the Management, the immediate supervisors, and all colleagues, as the most efficient way of working.
- Having in place a **Speak Up Policy** and a **D11 System - Complaints and Grievances Management** procedure.
- Ensuring that employees have the necessary training and information to exercise their rights.
- Taking actions to raise employees' awareness of healthy behaviours and issues concerning vulnerable groups.
- Regular assessment of the effectiveness of the preventive measures that are in place and review of the assessment of risks when necessary.

### 5.3 Raising awareness to the employees

The Company openly communicates to the employees, via several channels (Intranet, e-mails, etc.), information on their rights and obligations at the workplace, as well as on the Systems, the Procedures, and the Representatives they can use or address to, in the event of an incident, or to resolve a query, or to report a complaint.

Additionally, the Company provides through the **D11 System - Complaints and Grievances Management procedure**, **Speak Up Policy** and this **Policy against discrimination, violence & harassment at the workplace**, information regarding:

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- The channels of communication and the designated person in case of a complaint or grievance. The designated person is the Head of Internal Audit. Name and contact details are available in our **Code of Business Conduct**.
- The impartial investigation of complaints, the protection of confidentiality and personal data of affected employees and complainants.
- The prohibition of revenge against the affected employees and complainant, in accordance with article 13 of law. 4808/2021 and the provisions of Labor Law.
- The description of the consequences when violations are discovered (also referred to the **Internal Labor Regulation**). These consequences may include, but are not limited to, the recommendation for compliance, change of position, working hours, place of work, or the termination of the employment contract or cooperation, without prejudice to the prohibition of abuse of right stipulated in Article 281 CC.
- The right of cooperation with the competent authorities by providing any relevant information, upon request.

## 6. Employee rights in case of an incident of discrimination, or violence and harassment at the workplace

The Company informs the employees on the rights they have in case there is an incident of discrimination, or violence and harassment during their employment or even after the employment relationship under which the incident is alleged to have occurred, has ended. These rights are:

- the right to judicial protection
- the right to file a complaint and apply for labor dispute with the Labor Inspectorate, within the scope of its statutory powers
- the right to report to the Ombudsman, within the scope of his statutory powers
- the right to file a formal complaint within the Company via the **Speak Up line** or using the **D11 System - Complaints and Grievances Management procedure**.

Contact details on the above are also communicated to the employees ([Appendix 1](#))

In addition, every employee who is affected by an incident of discrimination, violence or harassment, feeling that there is an imminent risk for his/her life or health and safety, s/he has the right to leave the workplace, request to work from home or stop working, without loss of income or other consequences, in particular when the employer is the perpetrator of such conduct or when the Company does not take the necessary measures to reestablish peace at workplace, or when such measures are not efficient of stopping the discrimination, violence or harassment.

In such a case, the employee, must inform the employer in advance in writing, reporting the incident, justifying his/her belief. Once the risk has ceased to exist, the employee shall return to work. If the employee refuses to do so, the employer is entitled to apply a request to the Labor Inspectorate so as for the dispute to be resolved.

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## Appendix 1

### Contact details of the competent authorities

<b>Sepe-Hellenic Labor Inspectorate Social Inspection Directorate</b>	<b>+30 210 271 9717</b>
<b>Complaints Hotline (public)</b>	<b>155</b>
<b>Greek Ombudsman</b>	<b>+30 213 130 6600</b>
<b>Direct Mental Support &amp; Counselling Service For Women Who Are Victims Of Gender-Based Violence SOS Line</b>	<b>15900</b>
<b>Speak Up Line/Platform</b>	<b>00800 1100 28935,</b> <a href="http://frigoglass.ethicspoint.com">frigoglass.ethicspoint.com</a>

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