

POLICY FOR THE PREVENTION & COMBATING OF VIOLENCE & HARASSMENT

Purpose

With this Policy against Violence and Harassment at Work, "OLYMPMAR SA" (hereinafter "the Company") explicitly declares its zero tolerance for incidents and forms of behavior that constitute violence and harassment, and its intention for occupational safety and respect for human dignity to prevail in the work environment. All forms of violence and harassment occurring during work, linked with it, or arising out of it, including gender-based violence and sexual harassment, are prohibited. Any act of retaliation against another person who opposes any form of violence or harassment, files a complaint, testifies, assists, or participates in any incident investigation process is also expressly prohibited, regardless of where this retaliatory act originates. In this policy, specific Procedures are implemented, which include:

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- a) assessing the risks of violence and harassment at work,
- b) measures to prevent, control, limit, and address these risks, as well as to monitor such incidents or forms of behavior, and
- c) actions to inform and raise awareness among personnel.

Definitions

For the purposes of this Policy and within the meaning of Articles 3 and 4 of Law 4808/2021, the following definitions apply:

- **"Violence and Harassment"**: Forms of behavior, acts, practices, or threats thereof, which aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, whether occurring as an isolated incident or repeatedly.
- **"Harassment"**: Forms of behavior that have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, regardless of whether they constitute a form of discrimination, and include harassment on the grounds of gender or other discrimination grounds.
- **"Gender-based Harassment"**: Forms of behavior related to a person's gender, which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment under Article 2 of Law 3896/2010 and paragraph 2 of Article 2 of Law 4443/2016. These forms of behavior include sexual harassment

under Law 3896/2010, as well as forms of behavior related to the sexual orientation, expression, identity, or gender characteristics of the person.

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Scope of Application

This Policy applies to employees and persons employed by the Company, regardless of their contractual status, including those working under a contract for work, independent services, salaried mandate, those employed through third-party service providers, as well as persons undergoing training, including interns and apprentices, volunteers, workers whose employment relationship has ended, and individuals applying for work at the Company. Furthermore, this Policy covers all the above-mentioned forms of violence and harassment that occur due to or on the occasion of the work of the employed persons (as defined above), and specifically:

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- a) in the workplace, including public and private spaces and places where the employee provides work, receives remuneration, takes a break, especially for rest or meals, in personal hygiene and care areas, changing rooms, or employer-provided accommodation,
- b) during commutes to and from work, other travel, trips, training, as well as work-related events and social activities, and
- c) during work-related communications, including those conducted via information and communication technologies.

Specific forms under which risks and incidents of violence and harassment may appear

The violence and harassment addressed by this policy may manifest in the following ways (indicative forms and examples):

- **Verbal:** e.g., through verbal attacks, abusive comments, insults or accusations, offensive and persistent questions about one's age, marital status, race, nationality or religion, personal life, sexual interests, etc.
- **Physical:** e.g., through physical attacks aimed at causing physical injury and risks to life or health, as well as any kind of physical interference with normal work or movement.
- **Visual:** i.e., through visual stimuli such as posters, cartoons, caricatures, photographs, or any type of drawing that is derogatory based on characteristics protected by law.

- **Psychological:** through the creation of situations that can psychologically burden or cause excessive pressure, stress, tension, etc.

Specifically regarding gender-based harassment, or sexual harassment in general, this may include unwanted sexual advances, requests for sexual favors, and any other unwanted physical or verbal act of a sexual nature, regardless of the gender of the subjects of such behavior, such as (indicative forms and examples):

- Offering benefits (e.g., a promotion or salary increase) in exchange for sexual favors or creating an environment that promotes "sexual contact" as a means for professional advancement in the workplace.
- Retaliation or threat of retaliation after rejecting sexual advances.
- Indecent gestures, displaying sexually offensive graphic material in electronic or printed form (e.g., email, voice messages, books, files, photographs, etc.), caricatures or posters, or any material with indecent or sexual innuendos.
- Verbal insult and harassment through derogatory comments, sexual innuendos, the use of sexual "language" or "jokes" of a sexual nature, verbal sexual harassment or proposals, sexual comments about a person's body, excessively flattering or derogatory comments regarding specific parts or characteristics of a person's body or innuendos about behaviors, choices, and preferences of a sexual nature, the use of sexually derogatory comments or characterizations when describing a person, suggestive or indecent comments of a sexual nature in conversation, letters, invitations, notes, or other comments, adjectives, etc.
- Physical contact such as touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing, etc.

Measures to Address Violence and Harassment

A. On the part of the Company The obligations undertaken by the Company, aiming at the explicit implementation of this Policy by all employees and persons employed by the Company who fall under the Policy's Scope, consist of the following points:

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- a) The Company will receive, investigate, and manage every complaint or relevant report, demonstrating zero tolerance for violence and harassment, with confidentiality and in a manner that respects human dignity, and will not hinder the receipt, investigation, and management of these complaints or reports.

- b) The Company will provide assistance and access to any competent public, administrative, or judicial authority during the investigation of such an incident or behavior, if requested by them.
- c) The Company ensures an accessible, safe, and friendly work environment where relations among employees, associates, Management, and Company members are characterized by mutual respect, courtesy, honesty, understanding, trust, cooperation, and support. It provides employees with information regarding 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 regarding such incidents. It will take necessary and appropriate measures on a case-by-case basis to hinder, prevent, and in any case avoid the repetition of similar incidents or behaviors.
- d) The Company will provide information on the rights and obligations of employees and the employer, as well as of persons exercising managerial authority or representing the employer, to the extent and degree of their own responsibility, in the event of the occurrence, reporting, or formal complaint of such incidents.
- e) The Company will post in the workplace and make accessible information on the procedures existing at the Company level for reporting and addressing such forms of behavior, as well as the contact details for the competent administrative and judicial authorities according to the applicable provisions.
- f) The Company distributes material to combat violence and harassment, ensuring that everyone knows the Company's policy and procedures regarding violence and harassment incidents and knows where to turn in case of violence or harassment.
- g) The Company trains its executives to recognize violence and harassment at work and to provide the necessary support to its staff and associates.
- h) The Company encourages its employees and other persons falling under the scope of this policy to report incidents of workplace violence and harassment that they happen to witness.
- i) The Company, within the scope of its capabilities, takes every appropriate measure and makes every reasonable accommodation to working conditions to protect the employment and support employees who are victims of domestic violence.

- j) The Company appoints Mrs. Tsifodimou Maria as the reference person ("liaison") at the enterprise level, responsible for guiding and informing employees about the prevention and addressing of violence and harassment at work.

It is noted that the above obligations of the Company also apply to all persons who, either systematically or occasionally, exercise part of the managerial prerogative or generally represent the employer (senior executives, supervisors, etc.). These persons are responsible for ensuring compliance with the above in their sector and area of responsibility.

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B. On the part of the Employees Employees within the meaning of the Scope must fully comply with this Policy. Specifically, the obligations that employees or employed persons falling under the Scope (hereinafter "Employees") of this Policy must undertake for the purpose of its explicit implementation, consist of the following points:

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- a) Employees must be aware of the Rights of affected persons and the Consequences of violating the prohibition of violence and harassment, as defined in Article 12 of Law 4808/2021.
- b) Employees must actively participate, following a relevant invitation from the Company, in consultation processes with the Company for the adoption of measures or for the updating of this Policy.
- c) Employees must study and understand the content of the training material and updates that the Company communicates to them. In case questions or queries arise, Employees must contact the HR Department/the liaison in order to ultimately fully understand the content of the training material and updates.

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- d) Employees must comply with the mandates of this Policy and abstain from any behavior condemned by it.
- e) Employees must have understood the Internal Complaints Management Policy and activate it when an incident of violence or harassment occurs against them or generally comes to their attention.

Communication Channels and Framework for Submitting Internal Complaints

Employees and persons employed by the Company who fall under the Scope of this Policy will be able to submit Internal Complaints for incidents of Violence and Harassment to the following email addresses:

- to Mr. Taxopoulos Dimitrios, via email at fb@cavoolympo.gr
- and
- to Mr. Tsiourlianos Sotirios, via email at fom@cavoolympo.gr

Complaints must:

- Always be submitted in writing (i.e., via email to the above addresses) and be eponymous. The Company encourages the submission of complaints on an eponymous basis, regarding the Complainant, given that strict confidentiality will be maintained regarding their details. In any case, a Complaint may exceptionally be submitted anonymously.

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- Be submitted in good faith and without delay, as soon as the incident of violence or harassment becomes known.
- Be clear, specific, and contain as much information as possible to optimize the terms of their investigation. It is noted, however, that Sensitive Information unrelated to the Complaint and the core of the reported act or behavior should not be included in the Complaint and, whenever included, should not be evaluated, taken into account, or recorded in the Complaints Register, if and/or to the extent that this is feasible.

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- Include the name of the person (or persons) alleged to be responsible for the incident of violence or harassment, the date/time period and location where the act took place, the type of act, and as detailed a description as possible, as well as the person or persons who suffered violence and/or harassment.

Procedure for Managing Internal Complaints

As soon as the Recipient of Complaints receives an Internal Complaint through the above channels, they must forward it without delay to the Internal Complaints Management Team (hereinafter "I.C.M.T."). If the Recipient receives an oral Complaint, they must provide the Complainant with detailed instructions for submitting the incident in writing to the above email addresses, to activate the process of this Policy and the further investigation and handling of the incident. Upon receiving the Complaint, the I.C.M.T. must investigate it promptly. During

this investigation, the I.C.M.T. may call upon Managers, Supervisors, and Heads of departments or teams, on a case-by-case basis, to support its work. During the performance of its duties, the I.C.M.T. has the following responsibilities and obligations:

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- Examines the admissibility of complaints brought to its attention from all established Company Internal Complaint channels.
- Evaluates and prioritizes complaints.
- Communicates with the complainant, as well as with any other person(s) deemed necessary.
- Takes every appropriate measure to protect the personal data of the persons involved in the complaints.
- Maintains a Complaints Register as well as all necessary elements to document its final conclusion.
- Depending on the results of the investigations it conducts, it recommends to the Company the adoption of the appropriate measure or measures to address an incident of violence - harassment - retaliation or the archiving of the submitted Internal Complaint.

To facilitate the work of the I.C.M.T., both the complainant and all those summoned by it must be available and provide the requested information to fully investigate the complaints and assign any relevant responsibilities. If the Complaint is directly or indirectly against the Recipient thereof, then the Recipient must immediately forward the Complaint to the I.C.M.T. and subsequently abstain from the actions of the I.C.M.T. related to the specific investigation. The same applies to any member of the I.C.M.T., who must abstain from the meetings and other actions of the I.C.M.T. when it investigates a Complaint directed against them directly or indirectly, immediately informing the Company's Management and the other members of the I.C.M.T. of their impediment. In this case, the I.C.M.T. may request the Company's Management to appoint a substitute member, if it deems this necessary for the smooth, swift, and unhindered investigation of this Complaint. Furthermore, if complaints involve multiple members of the I.C.M.T., making its operation difficult or impossible, the Company's Management has the responsibility, aiming at a complete and objective investigation of the case, to establish a special ("ad hoc") Body for this purpose, namely a Special Operation Team. This team will be staffed by non-involved and/or non-impeded members and will have all the responsibilities of the I.C.M.T. and the responsibility for investigating the specific Complaint exclusively.

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During its work, the I.C.M.T. must treat every Complaint with due care and diligence. The I.C.M.T. conducts an investigation into the incidents contained in the Complaint as soon as possible. To facilitate its work, it may, if deemed necessary, request the assistance of other employees and/or associates of the Company, as well as receive additional professional support from other Company executives and/or external consultants. Moreover, to maintain safety in the workplace, industrial peace, and ensure the integrity of the investigations, the Company may, among other things and following a relevant recommendation from the I.C.M.T., transfer employees or modify their working hours pending the outcome of the investigation. In the same context, during the investigation, specific employees, associates, etc., may not be allowed partial or full access to Company facilities.

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Rights of Complainants and other parties involved in the Complaint

The Complainant has the right, upon request, to be informed by the I.C.M.T. both about the receipt of their Complaint [no later than within ten (10) working days] and about the outcome of its investigation [no later than within three (3) months]. The Complainant will be informed by a member of the I.C.M.T., in whatever manner is deemed most appropriate. Both the I.C.M.T. and the Company must protect individuals who file a Complaint, as well as individuals involved in Complaints. The investigation is carried out with confidentiality measures and applying the confidentiality of the procedure at every stage, in order to avoid the stigmatization and victimization of anyone involved in the Complaint, as well as any retaliation.

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The individuals who are alleged to be responsible for the reported incident have the right to be informed as soon as possible about the misconduct they are accused of by the persons managing the data included in the complaints. However, if there is a risk that the above notification will obstruct the investigation of the case and the collection of evidence, the notification of the reported persons may be postponed.

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Both the I.C.M.T. and the Company must protect every person who reports incidents of violence and harassment. In this context, any form of adverse treatment against anyone who has made an Internal Complaint, solely because of this fact (i.e., filing a Complaint), is prohibited. The I.C.M.T. and the Company's Management ensure to the greatest extent possible the avoidance of retaliation in

the event that anyone reports incidents of violence and harassment. More specifically, the Company is committed that individuals who have filed an internal Complaint will not suffer retaliation, harassment or marginalization, intimidation or threats, and unfair treatment as a result of their Complaint (e.g., dismissal, unfounded negative evaluation, denial of leave, exclusion from training seminars, non-approval of expenses, etc.). Also, unjustified changes to the employment contract as a result of the Complaint (e.g., suspension, demotion or denial of promotion, salary reduction, change of workplace, transfer, change of duties, alteration of working hours, etc.) are not permitted. The above measures do not apply in the case of a Malicious Internal Complaint.

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If anyone believes they are suffering retaliation in the above sense, they must report it immediately to the I.C.M.T., via the aforementioned Internal Complaint Channels, and the I.C.M.T. must investigate this complaint immediately as well. If the investigation reveals that retaliation indeed occurred, every appropriate and necessary measure will be taken to prevent its continuation or repetition in the future. If the complainant expresses the desire to be provided with special protection against any retaliation (e.g., transfer to another department or shift), the Company will examine the possibility of satisfying the relevant request within its existing capabilities and needs, following the formulation of an opinion by the I.C.M.T. as well.

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Furthermore, both the I.C.M.T. and the Company commit to making every possible effort and taking every appropriate measure to protect the identity of both the Complainant and the individuals included in the Complaints, and to handle each case with the utmost confidentiality and secrecy. Specifically, the Complainant's identity will not be disclosed to anyone other than the authorized individuals responsible for receiving, monitoring, and investigating the complaints, namely the members of the I.C.M.T. and any specialized external consultants and/or other Company executives who have been specifically called upon to investigate a specific incident. By exception, the Complainant's identity will be disclosed if:

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- The Complainant consents to the disclosure of their identity.
- Disclosure of identity is required by Law.
- The Complaint is fraudulent and has been characterized as malicious.
- Disclosure of identity is considered necessary to prevent or reduce a threat to the safety of human resources.

Furthermore, the Company commits to cooperating with the competent Authorities and providing them with any information and assistance requested regarding the issues addressed in this Policy.

Outcome of Complaint Investigation - Consequences

The I.C.M.T. will convene to evaluate a Complaint regarding any relevant incident (in person or via video conference), in full quorum, and its decisions will be taken by majority [each member of the Team will have one (1) vote]. The I.C.M.T. must inform the Company's Management, as well as the Complainant themselves upon request, about the outcome of the Investigation, and must record the relevant details in the Complaints Register. At the same time and depending on the outcome of the investigation, it may recommend corrective, disciplinary, and/or other actions to the Company's Management. These actions may include (indicatively and not restrictively):

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- a) disciplinary sanctions based on the currently applicable Internal Work Regulations,
- b) change of position, working hours, place, or mode of providing work,
- c) termination of employment contract or cooperation agreement,
- d) legal actions.

If a Complaint is proven to be malicious, provided the Reported Person requests it, they may be informed of the Complainant's identity in order to exercise their legal rights. Complaints that are shown to be blatantly malicious will be further investigated at the Company's discretion, regarding both the motives and the involved parties, in order to restore order and industrial peace using all legal means and actions. These actions may include (indicatively and not restrictively):

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- a) disciplinary sanctions based on any currently applicable Internal Work Regulations,
- b) change of position, working hours, place, or mode of providing work,
- c) termination of employment contract or cooperation agreement,
- d) legal actions.

If the investigation of a complaint about retaliation reveals that retaliation indeed occurred, every appropriate and necessary measure will be taken to prevent its

continuation or repetition in the future, as well as to restore order and industrial peace. These measures may include (indicatively and not restrictively):

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- a) disciplinary sanctions based on any currently applicable Internal Work Regulations,
- b) change of position, working hours, place, or mode of providing work,
- c) termination of employment contract or cooperation agreement,
- d) legal actions.

The I.C.M.T. maintains under its own responsibility a Complaints Register in electronic and/or printed form, in accordance with the provisions of the applicable national and European legislation for the protection of personal data. This archive includes the outcome of the investigation, as well as the evidence documenting this outcome.

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Final Remarks

This Policy is the product of consultation between the interested parties, Management, and Employees or persons employed by the Company who fall under the Scope of this Policy. It is clarified that this Policy is a "dynamic" document and can be enriched and updated based on new data each time, the suggestions of the Employees, the Occupational Physician, the Company's Special Advisors, the competent bodies, etc. The Company must ensure that all Employees have been informed and have unhindered access to the current version of this Policy. Notification must be made by any appropriate means, and Employees must study this Policy and act in accordance with its provisions.