	<b>ANTI-VIOLENCE AND HARASSMENT POLICY</b> <b>PL10.27</b>	<b>EDITION:1η</b> <b>VALID FROM: 01/10/2021</b> <b>APPROVAL CEO</b>
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## ANTI-VIOLENCE AND HARASSMENT POLICY

### **Purpose**

The purpose of the policy is to prevent and combat any form of discrimination based on personal characteristics and choices, as well as any violence and harassment that occurs during work, whether connected to it or resulting from it.


### **Field of application:**

Management and members of the companies THALIS E.S. S.A. employees with a dependent work contract, service providers with a salary mandate, project, independent services, and temporary employment contracts, employees employed through third-party service providers, interns and apprentices, employees whose employment relationship with the company has ended, prospective employees of the company, and others who do business or collaborate with the company Risk assessment.

**THALIS E.S. S.A.** complies with all measures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and treatment of all forms of gender-based violence and harassment, including sexual harassment.

**THALIS E.S. S.A.** declares that it recognizes and respects every employee's right to a workplace free of violence and harassment, and that it does not tolerate any such behavior, in any form, by any person. It is explicitly and unequivocally stated that any form of discrimination, violence, or harassment that occurs during work, whether connected to it or resulting from it, is strictly prohibited. By way of example and not limitation states that suggestive, sexual or racist jokes or comments, the use of offensive language, comments about someone's appearance or character that cause embarrassment, following, stalking and unwanted verbal or physical attention to someone, sending sexually explicit messages via SMS, email, social media, fax or letter, asking insulting and persistent questions about someone's age, marital status, personal life, sexual interests or preferences, as well as similar questions about one's race or nationality, including one's cultural identity and religion, sexual gestures or persistent dating suggestions or threats, insinuations that one's sexual favors can advance one's career, or that refusing to enter into a sexual relationship may negatively affect his professional course in the company, rude gestures, touching and any kind of unwanted physical contact, spreading malicious comments or insulting someone mainly due to discrimination on the basis of age, gender, type of marriage, pregnancy and maternity, any disability, sexual his preferences, religion or beliefs, threatening verbally or with gestures, cursing in public or in private, belittling or ridiculing a person or his abilities, whether in private or in front of others, outbursts of anger against someone, persistent or unwarranted criticism, exclusion from social events, work group meetings, discussions and collective decisions or planning, cyberbullying, abusive e-mails, letters and phone calls.

**THALIS E.S. S.A.** is committed to receiving, investigating, and managing any related complaint, demonstrating zero tolerance for discrimination, violence, and harassment with confidentiality and respect for human dignity. It also undertakes not to obstruct the receipt, investigation, and management of such complaints. The company undertakes to aid and access to any competent public, administrative, or judicial authority during the investigation of any incident of violence or harassment. For employees and those connected in any way with the company who violate the obligations arising

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from this Policy, the necessary appropriate and proportionate measures are taken, as the case may be, to prevent a similar incident or behavior from repeating itself.

## Definitions


### Awards:

Discrimination means discrimination based on sex, race, color, ethnic or social origin, genetic characteristics, language, religion or belief, political opinion, disability or health condition, age, or sexual orientation.

### Violence and harassment:

Violence and Harassment are the forms of behavior, actions, practices, or threats thereof that are intended to lead or may lead to physical, psychological, sexual, or financial harm, whether manifested individually or repeatedly. Harassment also includes forms of behavior that have the purpose or effect of violating the dignity of the person and creating an intimidating, hostile, humiliating, or aggressive environment, regardless of whether they constitute a form of discrimination, and includes harassment based on gender or for other reasons of discrimination. Harassment prohibited by this policy includes, but is not limited to:

- Verbal harassment, including, e.g., abusive comments, insults, or accusations
  - Physical harassment, including, e.g., physical interference with normal work or movement.
  - Visual forms of harassment, e.g., posters, cartoons, photographs, or designs that are derogatory based on characteristics protected by law.
  - Retaliation or intimidation for reporting or threatening to report any of the aforementioned forms of harassment or for cooperating with an investigation of a harassment incident
- Gender Harassment and Sexual Harassment**
- Gender-based harassment is any form of behavior linked to a person's gender that has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment. These forms of behavior include sexual harassment, as well as forms of behavior linked to a person's sexual orientation, expression, identity, or gender characteristics. Sexual harassment is defined as unwanted behavior of a sexual nature, including unwanted sexual proposals, requests for sexual favors, and any other unwanted physical or verbal act of a sexual nature. Such conduct may be expressed by a person of any gender and includes harassment of a person of any gender. For illustrative purposes, some examples of sexual harassment are as follows:
- Offering benefits (eg, promotion or salary increase) in exchange for sexual favors or creating an environment that promotes "sex" as a means of professional development in the workplace
  - Retaliating or threatening retaliation after rejecting sexual advances.
  - Visual conduct: obscene gestures, the display of sexually offensive graphic materials in electronic and printed form (e.g., e-mail, voice mail, books, files, photographs, etc.), cartoons or posters, or any material with obscene or sexual innuendo.
  - Verbal behavior: derogatory comments, sexual innuendos, use of "sexual language" or "sexual jokes"
  - Verbal sexual harassment or suggestions
  - Verbal abuse of a sexual nature: sexual comments about a person's body; use of sexually derogatory comments in describing a person; sexually suggestive or obscene comments in chat; letters, invitations, notes, or other comments; epithets.

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- Physical contact: touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing, etc. The above are indicative and do not constitute an exclusive list of prohibited acts. The employee or third party who engages in such prohibited conduct should and will bear full responsibility for their actions.

#### Retaliation

The company also prohibits any employee or third party associated with it from retaliating against another employee or third party who opposes violence or harassment, files a complaint, files a report, or assists or participates in any proceeding incident investigation.


To combat discrimination, violence, and harassment, the company has created a comprehensive reporting, management, and investigation mechanism.

#### **Reporting, investigating, and handling complaints.**

If any employee of the company or a third party connected in any way with it believes that they have been subjected to discrimination, violence, or any other form of harassment, or if they have found that such behavior is taking place in the work environment, they must follow the steps of the reporting process to report the incident.

The company treats with absolute confidentiality and discretion the management of all incidents of discrimination, violence, and harassment. Persons who have submitted reports will be informed of the receipt of the report and at regular intervals of the progress of the examination of their report. Upon completion of the investigation, the company will communicate the results of the investigation as soon as practicable and appropriate. If any employee of the company or a third party connected in any way with it considers that they have suffered retaliatory behavior due to filing a complaint or aiding in the process of investigating incidents of discrimination, violence, and/or harassment, they must report the said incident of retaliation immediately. Complaints of conduct in violation of this policy will be accepted in writing, by name or anonymously, and will be promptly and thoroughly investigated. for the retainer

To ensure safety in the workplace and the integrity of investigations, the company may, among other things, move employees or modify their working hours, pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities may not be permitted. If the result of the investigation shows that an incident of discrimination, violence, harassment, or retaliation has taken place, the company will take appropriate corrective, disciplinary, and/or other actions against the offender. These actions may include (indicative but not limited to): (a) disciplinary sanctions; (b) changes of position, hours, place, or method of providing the work; (c) termination of an employment contract or partnership agreement; and (d) legal actions. In any case, the offender may also be subject to criminal or civil liability, according to current legislation. Complaints that prove to be clearly malicious will be considered unacceptable and will be further investigated at the club's discretion, both in terms of motive and those involved, in order to restore order by any legal means.

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The legal advisor of the company is designated as the competent person for the examination of the reports.

This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the applicable regulatory legislation and covers the persons described in paragraph 1 of Article 3 of Law 4808/2021.

Competent telephone numbers.

- SEPE-Labor Inspection Body- Inspection Address: 15523
- TELEPHONE LINE FOR COMPLAINTS: tel. 155
- CITIZEN'S ADVOCATE, tel. 2131306600
- Direct Psychological Support and Counseling Service for Female Victims of Sexual Violence: SOS Line, Tel. 15900

THE ADMINISTRATION  
01/10/2021