

POLICY TO PREVENT AND COMBAT VIOLENCE & HARASSMENT AT WORK –

PROCEDURE FOR RECEIVING & EXAMINING COMPLAINTS ABOUT INCIDENTS OF VIOLENCE AND HARASSMENT OF GOLDEN A/S

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1. PURPOSE

The purpose of this policy is to prevent and combat any form of discrimination based on personal characteristics and choices, as well as any form of violence and harassment, which may manifest itself during work, whether linked to it or resulting from it.

2. SUBJECTIVE SCOPE

The scope of this agreement includes all persons employed under a dependent employment contract with 'GOLDEN A/S', providing services to it under contracts of paid mandate, work, independent services, and temporary employment, employed through third-party service providers, trainees, and apprentices, employees whose employment relationship with the company has ended and prospective employees of the company.

3. ZERO TOLERANCE TO VIOLENCE & HARASSMENT - RISK ASSESSMENT

"GOLDEN A/S" expresses its commitment to tackling and eliminating violence and harassment in the workplace, with a view to creating a working environment in which absolute respect for human dignity prevails. It is expressly and categorically stated that any form of violence and harassment that occurs during the period of violence and harassment that occurs during the period of violence and harassment is strictly prohibited. the duration of the work, whether linked to or resulting from it, including gender-based violence and harassment, as well as sexual harassment.

The company is committed to receiving, investigating, and handling any relevant complaint, showing zero tolerance for violence and harassment, with confidentiality and respect for human dignity. It also undertakes not to obstruct, but on the contrary to encourage morally/mentally and to facilitate in any appropriate way the receipt, impartial, and objective investigation, and management of the relevant complaints.

Employees and all persons falling within the scope of this agreement have the obligation to report immediately and without any delay, any act of violence or harassment, suffered by themselves or brought to their attention.

The company undertakes to provide full assistance and access to any competent public, administrative, or judicial authority in the investigation of any alleged incident of violence and harassment.

For employees and other persons falling within the scope of this policy, who violate the obligations arising from this policy, the company takes the necessary, appropriate, and proportionate measures, as appropriate, in order to prevent and prevent the recurrence of a similar incident or behavior.

The company may at any time conduct anonymous confidential surveys on the working climate through questions to staff. Through these surveys, the risks of violence and harassment are continuously assessed.

4. DEFINITIONS

4.1. Violence & Harassment

"Violence" and "Harassment" are the types of conduct, acts, practices, or threats that aim, lead to or are likely to lead to physical, psychological, sexual, or economic harm, whether occurring individually or repeatedly.

Harassment is also constituted by forms of conduct that have as their object or effect the violation of the dignity of the person and the creation of an intimidating, hostile, degrading, humiliating, or offensive environment, whether or not they constitute a form

of discrimination, and include harassment on grounds of sex or other grounds of discrimination.

The harassment prohibited by the present, includes in particular, completely indicatively and in no way restrictively:

- Verbal harassment, including e.g., abusive comments, insults, or reproaches.
- Physical harassment, including e.g., physical interference with normal work or movement.
- Visual forms of harassment, e.g., posters, cartoons, photographs, or drawings that are derogatory based on features protected by law.
- Retaliation or intimidation in the event of reporting or threatening to report any of the aforementioned forms of harassment or to cooperate in the investigation of an incident of harassment.

4.2. Gender-Based Harassment & Sexual Harassment

'Gender-based harassment' means forms of behavior connected with the sex of a person which has as their object or effects the violation of the dignity of that person and the creation of an intimidating, hostile, degrading, humiliating, or offensive environment. These types of behavior include sexual harassment, as well as forms of conduct related to the person's sexual orientation, expression, identity, or sex characteristics.

In particular, sexual harassment is defined as unwanted conduct of a sexual nature, including unwanted sexual proposals, a request for sexual favors, and any other unwanted physical or verbal act of a sexual nature. Such behavior can be expressed by a person of any gender and includes the harassment of a person of any gender. For purely illustrative purposes, some illustrative examples of sexual harassment are the following:

- Offering benefits (e.g. promotion or salary increase) in exchange for sexual pleasures or creating an environment that promotes 'sexual intercourse' as a means of professional development in the workplace.
- Revenge or threat of retaliation after the rejection of sexual proposals.
- The behavior: obscene gestures, display of sexually offensive graphic materials in electronic and printed form (e.g. e-mail, voicemail, books, archives, photographs, etc.), posters, or any material with obscene or sexual insinuation.
- The verbal behavior: derogatory comments, sexual innuendo, use of sexual "language" or "jokes" of sexual content.
- Verbal sexual harassment or suggestions.

- Verbal abuse of a sexual nature: sexual comments about a person's body, use of sexually derogatory comments in a person's description, sexually suggestive or obscene comments in conversation, letters, invitations, notes, or other comments, or adjectives.
- The physical contact: touches, bites, gestures of a sexual nature, blows, grabs, pushes, etc.

The above acts are indicative and do not constitute an exclusive list of prohibited acts. Employees and other persons falling within the scope of this policy, if they engage in such prohibited conduct, should and will bear full responsibility for their actions.

4.3. Retaliation

The company also prohibits any employee or person within the scope of this policy from taking retaliatory action against another person who opposes violence or any form of harassment, lodges a complaint, lodges, assists, or participates in any investigation process of the alleged incident.

5. MEASURES TO PREVENT, CONTROL, AND REDUCE RISKS - INFORMATION & AWARENESS-RAISING ACTIONS

All employees and other persons within the scope of this policy must comply with this policy.

The policy applies in the workplace, including public and private workplaces, in places where the employee is paid, takes a break for rest or to eat, or uses toilets or washbasins, during commuting, travel, training, work-related events or social activities, through work-related communications; including those carried out by means of information and communication technologies and during the worker's commute to and from work.

The company ensures an accessible, safe, and friendly working environment, where relations between employees, associates, management, and members of the company are distinguished by mutual respect, courtesy, honesty, understanding, trust, cooperation, and support.

The company, within its capabilities, takes all appropriate measures and makes any reasonable adjustment to working conditions for the protection of employment and the support of employees - victims of domestic violence.

The company takes all necessary measures to inform and sensitize the staff, using the appropriate means (e.g., printed and electronic material, etc.) to combat violence and harassment, ensuring that all employees are aware of the company's policy and procedures towards incidents of violence and harassment and know, as well as to which

responsible person ("reporting person") and how (what procedure and what means) they can address in the event of an incident of violence or harassment.

The company trains its executives to recognize violence and harassment at work and to provide the necessary support to its staff and partners.

The company encourages its employees and all persons falling within the scope of this policy to report without fear and without hesitation any incident of violence and harassment in the workplace which they happen to witness, or comes to their knowledge in any other way.

6. PROCEDURE FOR THE SUBMISSION & EXAMINATION OF COMPLAINTS – DESIGNATION OF A PETITIONER

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 form of harassment, or if they have found that such behavior takes place in the work environment, they must file a complaint of the incident. Complaints about behaviors that are in violation of this policy will be accepted as long as they are submitted by name and will be investigated promptly and thoroughly. The company treats with absolute confidentiality and discretion the management of all incidents of reporting discrimination, violence, and harassment. Persons who have lodged a complaint will be informed of its receipt and of the progress of its examination.

If any employee of the company, or any person falling within the scope of this Agreement, considers that they have suffered retaliatory conduct as a result of filing a complaint or assisting in the process of investigating incidents of discrimination, violence, and/or harassment, they must also file a complaint. To maintain workplace safety and the integrity of investigations; The company may, inter alia, move workers or modify their working hours, pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities of the company may not be permitted.

If the outcome of the investigation shows that discriminatory treatment, violence or harassment, or retaliation has taken place, the company will take appropriate, corrective, and/or other action against the offender. These actions may include (but are not limited to): (a) a change in position, hours, place, or manner of work; (b) termination of an employment or cooperation contract and (c) legal actions and procedures. In any case, the offender may also be liable for criminal or civil liability, in accordance with applicable law. This policy is applied in parallel with the applicable general legislation for the protection of the personality of the employee and does not affect his legal rights at the

level of civil and criminal law, but also the right to submit a complaint before the competent administrative authorities.

Any employee against whom any incident of violence and harassment has occurred must submit an oral or written complaint to the **Human Resources Manager** of the company **Mrs. Margarita Polykandrioti**, who is also designated as a "reference person", for the implementation of this policy. The complaint may be filed in person (in which case a concise report is drawn up signed by the complainant and the company's Human Resources Manager) or via e-mail and specifically at the e-mail address **mp@goldenas.com.gr**.

The report should indicate the details of the accused ('perpetrator'), i.e. the person who allegedly engaged in a form of prohibited behavior, the details of the recipient of the prohibited behavior ('victim'), as well as specific incidents in which they constitute the alleged prohibited conduct.

The Human Resources Manager thoroughly investigates each complaint and collects any information necessary in relation to it. Complaints and investigations shall remain strictly confidential to the greatest extent possible, taking into account the sensitivity of the case and the confidentiality of all parties involved. In particular, the Human Resources Manager may talk to the complainant and the complainant, examine witnesses and request the production of all kinds of documents (especially electronic e.g. emails, sms, messages in any kind of mobile phone communication application), which may exist and from which it can be proved that any incident of violence and harassment took place or not and communicate with the heads of each department.

If the Human Resources Manager completes her investigation, she submits a written report to the Management of the company, in which she states a concise justification for the result of her investigations. The results of the investigation shall be communicated simultaneously to both the complainant and the complainant in order to enable them to become aware of them. The completion of the investigation and the submission and notification of the findings of the Human Resources Manager, must take place as soon as possible and in any event no later than the period of four (4) weeks from the date of submission of the complaint by the complainant.

In the event that an incident of violence and harassment actually arises, the Management of the company proceeds, on a case-by-case basis, to take all necessary, appropriate, and proportionate measures against the complainant. Such measures may include, but are not limited to:

- (a) the recommendation for compliance
- (b) the change of job, working hours, place, and method of work

c) the termination of the employment contract or cooperation with the company.

It is hereby reminded that employees and all persons falling within the scope of the present, who face incidents of violence and harassment at work, regardless of the above procedure, have the right to appeal to the competent judicial and administrative authorities, as defined by law and indicatively: a. have the right to civil and criminal judicial protection, b. have the right to complain to the competent Labour Inspectorate, within the framework of its statutory responsibilities and c. have the right to report to the Public Defender of Rights, within the framework of his legal responsibilities.

7. MALICIOUS COMPLAINTS

Complaints that are proven to be manifestly malicious will be further investigated, at the discretion of the company, both in terms of motives and those involved, in order to restore order in all legal ways and actions.

8. FINAL PROVISIONS

Employees and all persons falling within the scope of this policy, if they need more information or have questions about this policy, may at any time contact the Human Resources Manager of the company.

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