

VITAEAL INVESTMENT - DEVELOPMENT S.A.

POLICY TO COMBAT DISCRIMINATION, VIOLENCE AND HARASSMENT AT WORK

1. INTRODUCTION

This Policy concerns the company under the name of " VITAEAL INVESTMENT - DEVELOPMENT S.A." (hereinafter "the COMPANY") and is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the applicable regulatory legislation.

2. PURPOSE

The purpose of this Policy is to prevent and combat any form of violence, harassment and discrimination based on personal characteristics and choices, which manifests itself during work, whether connected to it or arising from it, with the aim of establishing a work environment that respects, promotes and safeguards human dignity.

3. SCOPE

This Policy covers but is not limited to the following:

- The Management and members of the COMPANY
- Workers with a dependent labor contract
- Employees regardless of their contractual status
- Service providers with project, independent services and salaried mandate contracts
- Those employed through third party service providers
- Interns and apprentices
- Employees whose employment relationship has ended
- People who apply for work and workers in the informal economy and
- in general, any person who trades or cooperates in any way with the COMPANY.

This POLICY applies to both the workplace and the areas relevant to corporate meetings, conferences and work-related events, either on or off COMPANY premises, in person, online or by phone.

4. DECLARATION OF ZERO TOLERANCE TO DISCRIMINATION, VIOLENCE AND HARASSMENT

The COMPANY hereby expressly declares that it recognizes and respects the right of every employee to a work environment free of violence and harassment by demonstrating zero tolerance to discrimination, violence and harassment of any form by any person.

The COMPANY undertakes not to obstruct the receipt of relevant complaints and to receive, investigate and manage each complaint with confidentiality and respect for human dignity, providing assistance and access to any competent public, administrative or judicial authority during the investigation of any incident of violence and harassment and taking the necessary, appropriate and suitable measures, as the case may be, in order to prevent and not have a similar incident or behavior repeated.

The COMPANY has created an integrated mechanism for submitting, managing and investigating reports, by setting up special channels for filing reports and investigating them, as they are defined in the "REPORTING POLICY" of the COMPANY.

Specifically, the Reporting Policy reflects the principles of the COMPANY about resolving issues of violence and harassment at work and the individual procedures for Submitting, Managing and Investigating Complaints, which include in detail the steps that any complainant must take, the competent person and their responsibilities and the necessary actions to ensure the effective management of complaints and related incidents.

5. DEFINITIONS

- Discrimination: This includes discrimination on grounds of gender, race, color, national origin or social origin, genetic characteristics, language, religion or belief, political opinion, disability or health condition, age or sexual orientation.

- Violence and Harassment: Behaviors, acts, practices or threats that are intended, lead to or are likely to result in physical, psychological, sexual or financial harm, whether they occur once 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, degrading or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment based on gender or on other grounds of discrimination.

- Gender-based Harassment and Sexual Harassment: Gender-based harassment is any form of behavior that is causally linked to a person's gender, which has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. It constitutes a form of gender discrimination and includes sexual harassment, as well as forms of behavior linked to a person's sexual orientation, expression, identity or gender characteristics.

In particular, sexual harassment is defined as unwanted behavior of a sexual nature, which includes any form of unwanted verbal, psychological or physical behavior of a sexual nature, resulting in an insult to the personality of a person, in particular by creating an intimidating, hostile, humiliating, degrading or aggressive environment around them. It can be expressed by a person of any gender and involves harassing a person of any gender.

Harassment prohibited by this Policy may occur in person or in cyberspace, whether using corporate or non-corporate equipment and accounts, and includes, but is not limited to, physical, verbal, non-verbal, direct, indirect, covert or implied harassment.

- Retaliation: It is prohibited for any employee or third party, in any way connected with the COMPANY, to retaliate against another employee or third party who opposes violence or any form of harassment, submits a complaint, files a report, assists or participates in any incident investigation process.

- Person of Reference: The person designated as responsible for providing the employees with information and guidelines on issues related to the prevention and handling of violence and harassment in the workplace and who will receive, review, manage and investigate complaints by affected persons about violent or harassing behaviors.

6. MEASURES FOR PREVENTION, CONTROL AND LIMITATION OF RISKS

All the persons who according to Article 2 appertain to this Policy (including those connected in any way with the COMPANY) must comply with it.

THE COMPANY:

- Ensures an accessible, safe and friendly working environment where relations between employees, partners, Management and members are characterized by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.
- Identifies the risks associated with violence and harassment, taking into account any inherent risk arising from the nature of the activity, the job position, factors such as gender and age or other characteristics that constitute grounds for discrimination.
- Within the limits of its capabilities, it takes all appropriate measures to prevent, control, limit and deal with these risks, and to monitor related incidents and makes any reasonable adjustment to working conditions in order to protect employment and support the employees - victims of domestic violence.
- Takes all necessary measures to inform and raise awareness among staff, using appropriate media (e.g. printed and electronic material) to fight violence and harassment, ensuring that everyone is aware of the COMPANY's policy and procedures with regard to incidents of violence and harassment and knows who to contact in case of violence or harassment.

- Trains its staff to recognize discrimination, violence and harassment in the workplace, provide the necessary support to staff and their partners and know the process of handling violence/harassment incidents in detail.
- Encourages its employees and any third party associated with the company in any way to report incidents of discrimination, violence and harassment in the workplace that they witness.
- Evaluates the effectiveness of the applied preventive measures and countermeasures on a regular basis and reviews/updates the risk assessment.

7. SUBMISSION, INVESTIGATION AND RESOLUTION OF 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 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 for reporting the incident, as described in the REPORTING POLICY.

The COMPANY has created the appropriate mechanisms to conduct a fair, timely, thorough and objective investigation, ensuring the cooperation of all involved parties, employees or third parties.

The COMPANY guarantees secure and easily accessible channels of communication for receiving and reviewing complaints and informing complainants.

The COMPANY facilitates the relevant procedures and protects both the complainant and the complainees and investigates, reviews and deals with complaints impartially and protects the confidentiality and personal data of both victims and complainees.

Complaints about conduct in violation of this Policy will be accepted in writing, by name or anonymously, under the Reporting Policy and will be promptly and thoroughly investigated.

In any case, the affected person will be informed, at any stage of the procedure followed within the Company, of the possibility to also submit a complaint to the relevant

competent administrative authorities (Hellenic Labor Inspectorate and Ombudsman Organization) as well as to the judicial authorities of their choice.

Persons who have submitted reports will be informed of the receipt of the report and of the progress of the review of their report at regular intervals, in accordance with the Report Management Process. Upon completion of the investigation, the COMPANY will communicate the results of the investigation by any appropriate means as soon as this is practically possible and feasible.

The receipt, investigation and management of complaints is carried out promptly and impartially, in a manner that respects human dignity and ensuring the protection of the confidentiality and personal data of victims and complainees collected while carrying out the above tasks.

The COMPANY ensures the prohibition of retaliation against the affected person.

If any employee or third party associated in any way with the COMPANY believes that they have suffered retaliatory behavior as a result of filing a complaint or helping the process of investigating incidents of discrimination, violence and/or harassment, they must follow the procedure described in the COMPANY's Reporting Policy in order to report the said incident of retaliation immediately.

The Company and every person responsible for receiving and managing complaints undertake to provide their cooperation and assistance and any relevant information to the competent public, administrative and judicial authorities, if requested by them. This information is retained in a relevant file in compliance with the provisions of Law 4624/2019.

To maintain workplace safety and the integrity of investigations, the COMPANY may, among other things, move employees or modify their work hours pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities may not be permitted.

In the event of a violation being found, the Company takes the necessary, appropriate and suitable measures against the complainee in order to prevent and not have a similar incident or behavior repeated. 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 a) Recommendation for compliance b) Change of position, time, place or way of providing work c) Termination of the employment or cooperation contract.

In any case, the offender may also be subject to criminal or civil liability, according to the current national legislation.

This Policy applies in conjunction with the existing legislation for the protection of the personality of the employee and does not affect the legal rights of the affected person at the level of civil and criminal legislation nor the rights to file a complaint before the competent Auditing Authority.

The competent Administrative Authorities to which any affected person has the right to appeal are the following:

- I. Hellenic Labor Inspectorate (SEPE Helpline 1555)
- II. Greek Ombudsman Organization
- III. Women SOS, Immediate psychological support and counseling service for female victims of gender-based violence, Helpline 15900.
- IV. Hellenic Police.

8. MALICIOUS COMPLAINTS

Complaints which prove to be clearly malicious will be considered unacceptable and will be investigated further at the discretion of the COMPANY in order to restore order by every legal manner and means.

9. PERSON OF REFERENCE

Ms. Rodoula Moraitis has been designated as the competent person who will receive, review, manage and investigate the complaints for violent or harassing behavior by the affected persons.

The person of reference is responsible for providing the personnel with information and guidelines on issues related to the prevention and handling of violence and harassment in the workplace, as well as for responding to all questions related to the execution or interpretation of this Policy.

The contact details for the person of reference are:

Phone: +302109962806

Email : r.moraiti@vitael.gr