

POLICY AGAINST ALL FORMS OF VIOLENCE AND HARASSMENT

Company Name; **FARAD HEAT EXCHANGERS SA**

Legal representative's details

FIRST NAME; KONSTANTINOS

SURNAME; FANOURIADIS

FATHER'S NAME; DIMITRIOS

COMPANY ADDRESS; ALON 14 STR.

- FARAD HEAT EXCHANGERS SA follows all the procedures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and administration of all forms of violence and harassment, including gender-based violence and sexual harassment.
- The purpose of this policy is to create and develop a work environment that respects, promotes, and ensures human dignity and the right of every person to be in a working place free of violence and harassment. **FARAD HEAT EXCHANGERS SA** declares that it recognizes and respects the right of every employee to work in an environment free of violence and harassment and that it does not tolerate any such behavior, of any form, by any person.
- This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the applicable regulatory legislation and includes the individuals mentioned in the clause 1 of Article 3 of Law 4808/2021.

A. Policy to prevent and combat violence and harassment at the workplace.

a) Assessment to identify the risks of violence and harassment at work.

The risk is estimated to be low due to the constant presence of all three legal representatives of the company in the workplaces and the absolutely strict instructions and recommendations that have been given to respect everyone's dignity and to completely avoid any form of violence and harassment. It is important to highlight that throughout all these years that our company

operates, there has never been any incident of this kind. At any case, there is full vigilance and continuous concern regarding these matters.

b) The measures taken by the company to prevent, control, limit and deal with these risks, as well as to monitor such incidents or forms of behavior are the following;

- Encouragement to maintain a working environment where respect for human dignity, cooperation and mutual assistance are core values.
- Open communication between the employers, managers, and colleagues.
- Report / complaint management process.
- Ensuring that the employees have the necessary training / information to perform their duties, particularly in jobs that carry a higher risk of incidents of violence and harassment.
- Actions to raise the employees' awareness of healthy behavioral patterns (e.g., avoiding addictions).
- Provide guidance and support for the victims of violence and harassment or the victims of domestic violence in order to reintegrate back into workplace.
- Employee training in the procedures of violence incident management.
- Assessing on a regular basis of the effectiveness of applied preventive measures and countermeasures and reviewing/updating the risk management plan and measures.

c) Actions aiming to improve employees' information of awareness.

The company declares its zero tolerance for violence and harassment.

The company is committed to providing staff with information and guidelines in accessible formats, as appropriate, on the risks of violence and harassment, as well as on the related measures taken for prevention and protection, on the procedures that apply within the company and on the rights provided by law in case such incidents occur.

d) Information on the rights and obligations of the employees and the company, as well as the individuals who manage or represent the company, to

the extent of their own responsibility, in case of the occurrence or reporting or denunciation of such incidents, as well as for the relevant procedures.

The company informs the employees that if a person is affected by any incident of violence and harassment during the access to employment, during the employment, or even if the contract or the employment relationship act –in which the incident or behavior allegedly occurred– has expired, it has the right:

- i) to file for judicial protection,
- ii) to appeal and file a complaint and request for a labor dispute resolution at the Hellenic Labour Inspectorate within its jurisdiction provided by law,
- iii) to file a report at the Greek Ombudsman Independent Authority, within its jurisdiction provided by law,
- iv) to file a complaint within the company in accordance with the complaint administration policy.

In any case, when such behavior is reported within the company, the individual affected holds every right to appeal to any competent authority.

The company informs the employees about the details of the competent administrative authorities, to which any affected individual has the right to appeal (Hellenic Labour Inspectorate, Greek Ombudsman Independent Authority) and therefore specifically informs the staff about the complaint hotline 1555 of the Hellenic Labour Inspectorate, as well as the hotline SOS 15900 for counseling services of psychological support for the female victims of gender-based violence.

e) The HR is designated as the liaison for guiding and informing the employees about the prevention and management of violence and harassment at workplace.

f) Protect the employment and provide support to the employees who are victims of domestic violence, whenever possible, by any appropriate means or reasonable adjustment.

The company intends to provide special leave and to follow flexible working arrangements upon the request of the domestic violence victim employee, in

order to support him/her to maintain his/her job and to smoothly reintegrate back into the workplace after such incidents have occurred, specially in cases where minor children, or children with special needs or serious illnesses are included.

B. Procedure for receiving and examining complaints.

a) Communication channels – Competent persons

The Procedure for receiving and examining complaints is the following;

The company has outsourced the procedure for receiving and examining complaints to the Law Firm under the name “Sarris Law Firm” which is located at Praxitelous 151 Str. in Piraeus. Each employee has the right to file a complaint to the member and managing partner of the aforestated law firm, lawyer Michael Theodore Sarris, either via phone (2104119240–6972034429) or via email at the email address mick.sarris@gmail.com.

The company clarifies that it is not mandatory to submit the complaint exclusively to the aforestated law firm. On the contrary, it reminds that the Employee can also submit the complaint to the complaint hotline 1555 of the Hellenic Labour Inspectorate and can as well turn to the hotline SOS 15900 for counseling services of psychological support for the female victims of gender-based violence.

b) Investigates and examines the complaints impartially and protects the confidentiality and personal data of victims and plaintiffs.

The submission and examination of complaints to the forestated law firm will be conducted at absolutely no cost to the employee and absolute confidentiality will be held during the examination.

The company commits that it will not prevent the submission and examination of any complaint and has expressly instructed the aforestated law firm to immediately investigate and handle any such complaint, and to examine the complaints with impartiality and respect for human dignity. The company commits that it will take immediate measures to protect the affected party.

It is also prescribed that in any case, it is a commitment of the aforestated law firm to maintain confidentiality and protect the Personal Data (GDPR) that are collected during the performance of the above tasks. Likewise, the company

will also provide confidentiality and protect the Personal Data (GDPR), if the company is informed by the forestated law firm of any complaint or on the findings derived from its examination.

c) Retaliation against the aggrieved person is completely prohibited, and any such action will have consequences against anyone who retaliates or attempts to retaliate. Consequences may include recommending compliance and avoidance of such actions, changing of the working post, working hours, working place or way of providing work or even terminating the employment relationship act of anyone who commits or attempts to commit retaliation. It is made clear that, in any case, the company commits to comply with the obligation to prohibit retaliation, in accordance with article 13 of Law 4808/2021 and with the provisions of the labor legislation.

d) In case that a violation has occurred, the consequences against the person who harasses in any way or resorts to any form of violence may include recommending compliance and avoidance of such actions, changing of the working post, working hours, working place or the method of providing work or even terminating the employment relationship act.

e) In order to investigate the complaints, the company will cooperate with both the forestated law firm and the competent authorities and will provide any relevant information to them, if requested.