



FLEXOPACK SOCIÉTÉ ANONYME COMMERCIAL AND INDUSTRIAL PLASTICS COMPANY

TZIMA LOCATION – 194 00 KOROPHI ATTICA, GREECE
General Electronic Commercial Registry (G.E.M.I.) No. 582101000

POLICY

***FOR THE PREVENTION AND FIGHT AGAINST VIOLENCE AND
HARASSMENT AT WORK***

AND

***FOR THE MANAGEMENT OF INTERNAL COMPLAINTS FOR VIOLENCE AND
HARASSMENT INCIDENTS***

VERSION 1.0 | SEPTEMBER 2021

1. SCOPE OF APPLICATION

This Policy is being adopted in accordance with articles 9 and 10 of Law 4808/2021 and the applicable legislation and applies to all employees and staff employed by the Company and the other companies of Flexopack Group, regardless of the specific, case by case, contractual agreement which binds them to the company; meaning whether it is a contract of full-time employment or a project-based contract of employment, or a contract for independent services, paid employment, and even those employed through third-party service providers, as well as trainees, including trainees and apprentices where the employment relationship has ended, as well as job applicants.

2. PURPOSE OF THE POLICY

The Policy aims to create and consolidate a safe working environment, which promotes and ensures human dignity and respects the rights of workers, the diversity and the personality of each person in a world of employment without violence and harassment.

I. PREVENTION AND FIGHT AGAINST VIOLENCE AND HARASSMENT AT WORK

1. BASIC PRINCIPLES AND PROHIBITIONS

Flexopack declares that it recognizes and respects the rights of every employee in a work environment free of violence and harassment and that it does not tolerate any such conduct, in any form, by any person.

In this context and in particular the following apply:

- All forms of violence and harassment, whether related to or arising from work, including violence and gender-based harassment as well as sexual harassment, are expressly prohibited.
- No form of discrimination or harassment on the basis of race, color, religion or belief, sex, age, nationality, ethnicity, family or social status, sexual orientation, identity or gender, physical or mental illness or medical illness in general, physical appearance, or other element protected by Greek and EU Law.
- Every employee who is a recipient or witness of such incidents must immediately inform the Management of the Company.
- Relevant issues are handled with due discretion, confidentiality and efficiency.
- The Company demonstrates zero tolerance for violence and harassment wherever it comes from and wherever it occurs.

2. ASSESSMENT OF RISKS OF VIOLENCE AND HARASSMENT AT WORK

The Company conducts risk assessments for the safety and health of the Employees already on the basis of par. 1a' of article 43 of Law 3850/2010 (Code of Laws for health and safety at work), and takes into account the related psychosocial risks in occupational safety and health management and identifies - and systematically reassesses - these risks.

In assessing these risks, factors such as the following are taken into consideration:

- the conditions and organization of the work that is being performed (especially night work) and the management of human resources within the Group (fair distribution of job positions between men - women, regardless of age or other characteristics),
- the degree of interaction between employees and third parties, such as customers, suppliers, service providers, etc.,
- the absence in the specific work environment of discrimination, abuse of power relations and gender-based cultural and social norms,
- the fact that the Group employs most women, even in key management positions and on a high hierarchy level,
- the fact that existing occupational safety and health plans address the needs of workers in the workplace,
- the organizational structure and physical layout of the workplaces (for example, there are no "dark" spots, there are also no isolated workplaces, while the surveillance of the premises for security reasons is adequate and continuous, through video surveillance systems, etc.) and the Company's parking spaces, warehouses and other facilities are safe and deterrent to such risks;
- the interpersonal relationships of employees, etc.

3. MEASURES FOR THE PREVENTION, CONTROL AND RESTRICTION OF VIOLENCE AND HARASSMENT AND FOR THE MONITORING OF RELATED INCIDENTS / TYPES OF BEHAVIOR

In order to reduce the possibility of occurrence of related risks and in order for the above evaluation / assessment to yield a zero, and yet limited, possibility of occurrence of incidents of violence and harassment, the Company takes measures and plans its strategy as follows:

- Encourages the maintenance of a working climate where the respect for human dignity, cooperation and mutual assistance constitute core values.
- Cultivates open communication with the employer and the immediate superiors and colleagues.
- Ensures that the employees have the necessary training and information to carry out their duties, especially in jobs that are at greater risk with regard to incidents of violence and harassment.
- Takes technical measures (emergency warning, adequate lighting, etc.).
- Undertakes actions to raise employees' awareness of healthy behavioral patterns (e.g. avoidance of addictions), but also on issues concerning vulnerable categories of employees.
- Train its personnel in violence management procedures.
- Regularly evaluates the effectiveness of the implemented preventive measures as well as the countermeasures, and reviews / updates the risk assessment and the above measures.
- Formulates a relevant policy and provides for effective complaint procedures (reporting and complaint grievance management).
- Announces the standards and values of the Company at all levels of its business organization and ensures that they are observed in the most appropriate manner.
- Ensures that senior managers act as role models.
- Constantly monitors any incidents concerning abuse of power.
- Establishes and implements transparent recruitment and promotion procedures without discrimination and adheres to a meritocratic recruitment and promotion policy.

- Formulates a relevant policy and provides effective procedures for submission complaints as well as report / complaint management.
- Ensures professionalism and scientific rigor in the investigation and settlement of relevant complaints.
- Ensures that there is in place a confidential environment and relationship of trust so that victims and witnesses can report violence / harassment incidents without fear.
- Guides and supports victims of violence and harassment or victims of domestic violence to be integrated into the workplace.

An important role in dealing with violence / harassment is played by the top management which operates on a participatory model and its members are actively employed in the business units of the Group, contributing to the cultivation of a positive team culture.

4. IN MORE SPECIFIC TERMS THE ACTIONS OF EMPLOYEES' INFORMATION AND AWARENESS

The Company declares its zero tolerance for incidents of violence and harassment and is committed to providing its personnel with briefing and information in accessible formats, as appropriate, on potential risks of violence and harassment, as well as related prevention and protection measures, with regard to the procedures that exist at the company level and for the possibilities provided by the legislation in case of such incidents. At the same time the Company will be educating its employees regarding the importance of the principle of equal treatment between men and women and the prohibition of discrimination based on gender or sexual orientation.

In the context of raising the awareness of its personnel, the Company, among other things, encourages the participation of employees' representatives and executives in training programs and related seminars on the identification and management of the risks of violence and harassment at work.

This Policy is maintained by being posted in the workplace and is accessible via the intranet of the Company. At the same time, the Company takes the appropriate measures so that the Employees and their representatives have at hand all the necessary information in relation to:

- the legislation in force regarding the health and safety of the Employees and the adoption of the above by the Company,
- the safety and health risks, as well as protection and prevention measures / activities concerning either the company in general or the various job positions and / or duties.

Furthermore, the Company ensures that each Employee receives, free of charge, appropriate and adequate training in the field of safety and health protection and integrity, in the form of information and instructions on the occasion of his/her recruitment, and with regard to any change of duties, change of the respective working conditions, change of equipment / technology, etc., as well as in terms of introduction of new technology that specifically concerns his/her work or duties.

5. OBLIGATIONS OF COMPANY - EMPLOYEES

The Company as an employer is obliged to do the following:

- Ensure the health and safety of employees in all aspects of work and in the same manner take measures to ensure the health and safety of third parties.
- To comply with the law and regulations on the health and safety of employees.
- To take the necessary measures in order to safeguard the health and safety of Workers and to protect Workers specifically from acts of violence or insult to their personality or damage to morals, as well as to prevent and stop any manifestations of violent behavior and harassment at work.
- Supervise the proper implementation of these measures and adjust them according to the circumstances.
- To apply the instructions of the authorities and to facilitate their work.
- Develop and (re) evaluate relevant programs and procedures.
- To maintain the means and facilities of the Company and to monitor their safe operation.
- To adapt to technical developments.
- Receive, investigate and manage any complaints or related reports by demonstrating zero tolerance for violence and harassment, in a manner that shows confidence and respects human dignity, and does not prevent the collection, investigation and management of such complaints or reports.
- To provide assistance and access to any competent public, administrative or judicial authority, during the investigation of such incident or behavior, if requested by the authorities.
- Provide employees with information on the potential risks of violence and harassment in the workplace and related prevention and protection measures, including the obligations and rights of employees as well as of the Employer in such cases.
- To post information in the workplace and make it accessible to Employees with regard to the company procedures for reporting and dealing with such behavior, as well as to post the respective contact details of the competent authorities.
- Collaborate with the occupational physician on issues of work physiology and psychology, including the prevention of violence and harassment at work.

The Managers and Heads of Divisions and / or Departments of the Company and the companies of the Group must inform their subordinates about the present Policy and the relevant procedures, encourage their subordinates to adopt a positive, open work culture, so they can feel that they can easily express their concerns and implement the decisions of the competent bodies of the Group in order to deal with possible reports / complaints.

Every employee has the obligation:

- to apply the rules of health, safety and protection against violence and harassment set by the Company,
- to take care, as far as possible, for the safety and protection of his/her health and integrity, as well as for the safety, health and integrity of other persons whenever they are affected by his/her acts or omissions during his/her employment, always in accordance with the training guidelines and the appropriate instructions provided by the Company,
- to report immediately all situations that may reasonably be considered to pose a direct and serious risk to the safety, health and integrity of his/her personality, as well as any related deficiencies identified,
- attend seminars or other training programs conducted by the Company on health, safety and protection against violence and harassment,
- cooperate with the occupational physician of the Company within the framework of his/her responsibilities.

6. EMPLOYEES 'RIGHTS

Any person who may be harmed by an incident of violence or harassment, even if the relationship in which the incident or conduct that has allegedly occurred against him / her has ended, possesses the following:

- the right to judicial protection,
- the right to appeal, file a complaint and apply for a labor dispute before the Labor Inspectorate,
- the right to report to the Ombudsman within the framework of his / her legal duties, as well as
- the right to file a complaint within the Company under the Internal Complaints Management Policy for incidents of violence and harassment,
- and generally to appeal to any competent public authority with regard to such incidents.

7. RESPONSIBLE (COMPETENT) PERSON FOR REPORTING PURPOSES

The Personnel Manager is the person responsible on behalf of the Company for issues related to this Policy and acts as a reference person - liaison at company level and is also responsible for guiding and informing employees about the prevention and treatment of violence and harassment at work. This is being performed regardless of whether an employee approaches the Personnel Manager on the occasion of an incident or complaint concerning an incident of violence / harassment or not.

The access of the employees to the above person is easy and direct and is done by email at: hr@flexopack.com or in person at his/her office.

The personal data which may come to the knowledge of the above person during the exercise of his/her role as a reference person - liaison of the employees are protected at all times in accordance with the law and with this Policy.

8. PROTECTION / SUPPORT OF EMPLOYEES WHO ARE VICTIMS OF DOMESTIC VIOLENCE

The Company considers that domestic violence can affect the employment, productivity, health and safety of its Employees, and believes that as employer it can assist substantially, along with other measures or actions, in recognizing, responding to and addressing / mitigating the effects of domestic violence, to the extent, of course, that this is possible.

In this context, the Company supports its employees who may face domestic violence and assists them, by any appropriate means, by proceeding with reasonable adjustments to the labor conditions and by granting on a case-by-case basis a specific leave to employees / victims of domestic violence. By this manner the Company supports and helps its employees to maintain their employment position and monitors their normal reintegration after such incidents, especially in cases associated with the taking care of underage children or children with disabilities or serious illnesses.

In particular, if an Employee is concerned about the risks of domestic violence in the workplace or, for example, has taken restrictive measures or related protection against a

partner or ex-partner, and generally if a victim of domestic violence is affected by such an incident in his / her work, the Company:

- takes practical actions / proceeds with safety planning (e.g. by providing a safe parking space or by temporarily restructuring the victim's work duties),
- provides assistance to him / her on information level about specialized services and support,
- refers him / her to specialized organizations for domestic violence, safe housing, legal aid and counselling,
- grants him / her permission on a case-by-case basis to access support from domestic violence organizations, to seek counselling, to attend court, to attend police or other authorities, etc.
- may make flexible adjustments to his / her work duties and responsibilities for a specified period of time,
- will provide him / her on a case by case basis, in the context of immediate support, with medical and psychological evaluation and support, etc.

II. MANAGEMENT OF COMPLAINTS / REPORTS OF VIOLENCE / HARASSMENT

1. BASIC PRINCIPLES OF ACCEPTANCE AND EXAMINATION OF REPORTS / COMPLAINTS

- The Company takes care of the collection and investigation of all elements of evidence and information related to each submitted report / complaint.
- The Company ensures an environment of trust and security for the Employees and encourages the submission of reports of incidents of violence and / or harassment.
- The anonymity and personal data of the persons submitting reports / complaints are protected and, as long as these persons are Employees, their position in the Company or their future professional development is not in jeopardy.
- Reports / complaints are made without the promise of payment or the existence of any consideration with regard to the submitter of the report / complaint.
- Reports / complaints are treated with respect when it comes to the general and specific principles and values such as, in particular, respect for personality, trust, transparency, decency, honesty and professional conscientiousness.

In this context, the Company:

- receives and does not prevent the proper collection of reports / complaints,
- investigates and manages any such complaint promptly,
- investigates and examines complaints with impartiality and respect for human dignity,
- takes immediate measures to protect the victim,
- investigates the respective reports / complaints diligently and without discrimination,
- responds attentively to any report / complaint showing courtesy and understanding,
- provides guidance on existing communication mechanisms on relevant issues,
- ensures the protection of the data of the complainant and of any third party named in the report / complaint,

Reports / complaints are dealt with under this Policy as far as possible on a central level.

2. COMMUNICATION PROCEDURE - COMPETENT PERSONS

Any Employee wishing to report a case of violence / harassment may do so, in writing or verbally, to the Personnel Manager, who is responsible for receiving and examining complaints as well as for informing complainants (under the supervision of the Chief Executive Officer):

- Via e-mail: hr@flexopack.com),
- Through the complaint box located at the Company's production site,
- The Employee can also request a personal meeting at the Personnel Department or at the occupational physician or at his / her immediate Supervisor, who are obliged to forward the report / complaint to the Personnel Department.

At any stage of the proceedings, the victims may of course also file a complaint with the competent administrative authorities within their jurisdiction.

3. INVESTIGATION AND EXAMINATION OF COMPLAINTS

The Company ensures the correct and safe operation of the above means of communication / communication channels as well as the observance of the protection and confidentiality of the complainant.

Both eponymous and anonymous complaints are accepted. However, due to the nature of the reported incidents, the submission of personal complaints is encouraged as they facilitate the conduct of the necessary investigation and the taking of the necessary actions towards the effective management of incidents.

Upon receipt, the complaint is checked and evaluated, the incident is investigated and proposals for resolving the issue are being formulated. Then the involved parties are being informed and, upon completion of the relevant investigation, the necessary measures are taken to resolve the issue of complaint with the approval of the Chief Executive Officer.

The Personnel Department, being the reporting officer - liaison for the complaint, may request further information and maintain contact with the above party, and at all times undertakes to maintain the confidentiality and protection of personal data, which are collected during the performance of relevant duties.

The investigation should be completed within a reasonable time period, always depending on the nature and complexity of the issue being reported, whereas any delay should be adequately justified.

If the report / complaint is related to an employee of the Personnel Department or to a person involved in the investigation process or any of these persons has a conflict of interest, then that person withdraws from the investigation of the complaint and is being accordingly replaced.

The Personnel Department keeps a record of the reports / complaints it receives, as well as the documents related to each of the cases.

4. PROTECTION OF CONFIDENTIALITY AND PERSONAL DATA OF COMPLAINANT AND ACCUSED

The Company ensures the protection of the confidentiality of the identity of the complainant, the accused party and any third party named in the report / complaint.

Personal information not related to the nature of the complaint is not further processed and is being deleted.

All processing of personal data under this Policy is carried out in accordance with the relevant national and European Union legislation.

The data of all involved parties are protected and processed for the sole purpose of verifying the validity or not of the specific report / complaint and to investigate the specific incident.

Access to the data contained in the reports / complaints for the purposes of examining or managing the reports / complaints can only be made by those involved in the management and investigation of each case, as well as the persons included in the report / complaint, witnesses and any other party with a legitimate interest.

In this context, the Company takes all the necessary technical and organizational measures to protect the respective personal data.

5. PROHIBITION OF RETALIATION AND FURTHER VICTIMIZATION

No person making a complaint / report is subject to the harmful consequences of their actions, such as unjustified disciplinary action, victimization, threats or other ill-treatment.

In this context, the termination or in any way the resolution of the legal relationship on which the employment is based is prohibited and is also invalid, as well as any other unfavourable treatment of an Employee, if it constitutes retaliatory behavior or a countermeasure for an incident of violence and harassment. Meaning when this is performed as a reaction to a protest, complaint, testimony or any other action, either within the Group or before a court authority or any other competent authority.

6. CONSEQUENCES ON VIOLATION

If an Employee violates the prohibition of violence and harassment, the Company is obliged to take the necessary and appropriate measures on a case-by-case basis against the complainant, in order to prevent the recurrence of such incident or behavior.

These measures may include:

- recommendation for compliance,
- the change of position,
- the change of working hours,
- the change of place or manner of providing work,
- the termination of employment or cooperation,

without prejudice to the prohibition of the abuse of rights.

7. COOPERATION WITH COMPETENT AUTHORITIES

The Company, as well as any competent person or department involved in the reception and management of complaints at the company level, must cooperate with any competent public, administrative or judicial authority, which, either ex officio or upon request by the affected person, within its competence, requests the provision of data or information and is also committed to provide assistance and access to the relevant data, by keeping a record and safeguarding the protection of personal data as above.

8. CONTACT DETAILS WITH THE COMPETENT AUTHORITIES

- **Labor Inspectorate**
Citizens' hotline: 1555
37, October 28th Street, Athens, PC 104 32
<https://www.sepenet.gr/liferayportal/2>
- **Ombudsman**
17 Chalkokondyli Street, Athens, PC 104 32
Telephone line: 21 3130 6600
<https://www.synigoros.gr/>
- **Immediate psychological support and counselling service for women victims of gender-based violence**
SOS hotline - violence against women: 15900
- **Greek Police**
Telephone line: 100
www.astynomia.gr
- **Department of Gender Equality at Work - Directorate of Individual Regulations of the Ministry of Labor and Social Affairs**
29 Stadiou St., Athens, PC 10559
Telephone line: 2131516384
- **General Secretariat for Family Policy and Gender Equality**
8 Dragatsaniou St., Athens, 105 59
Telephone line: 21 0331 7305
<https://isotita.gr/>

Version	Date	Description	Approval
1	16/09/2021	Initial version of the Procedure	16/09/2021

[The full text of this Policy is posted on the Company's workplaces and on its intranet.]

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