



**Policy Against Violence and
Harassment in the Workplace**

MAY 2023

1. PURPOSE / ZERO TOLERANCE STATEMENT

TIF -HELEXPO S.A., through this policy, aims to prevent and combat all forms of violence and harassment that occur during work, whether connected to it or arising from it. TIF-HELEXPO S.A. prioritizes the development of a culture of free expression in the workplace and encourages immediate reaction and reporting of any inappropriate behavior related to violence and harassment in the workplace.

Specifically, TIF-HELEXPO S.A. is committed to the inclusion and strengthening of preventive and corrective mechanisms, as well as procedures for addressing and eliminating incidents of violence and harassment in the workplace.

In order to create a work environment where respect for human dignity prevails, it explicitly and categorically declares the prohibition of all forms of violence and harassment that occur during work, whether connected to it or arising from it, including violence and harassment based on gender, religious beliefs, and sexual harassment. Furthermore, it is committed to refraining from victimizing the person who was harassed or subjected to violence, and to refraining from any actions that could be characterized as "retaliation" or "revenge."

In addition to the above commitments, TIF-HELEXPO S.A. explicitly states that it will assist any public administrative or judicial authority in the investigation of incidents of violence and harassment within the organization.

2. SCOPE OF APPLICATION

The individuals covered by the protection of this policy are all employees of TIF-HELEXPO S.A., regardless of their contractual status, including members of the Management, all employees with employment contracts, those employed under project-based contracts, independent services contracts, paid mandates, those working through third-party service providers, employees on loan contracts, trainees, apprentices, and volunteers. The policy also applies to former employees whose employment has ended, as well as individuals seeking employment.

The policy applies in all workplaces of TIF-HELEXPO S.A. and its subsidiaries, including both public and private spaces, locations where remote work is provided, and areas where corporate events, meetings, conferences, etc., are held.

3. HARASSMENT AND INAPPROPRIATE BEHAVIOR

"Violence and Harassment" refers to forms of behavior, actions, practices, or threats of such behavior, which aim, result in, or may result in physical, psychological, sexual, or economic harm, whether occurring once or

repeatedly. This includes, by way of example, forms of behavior that aim to or result in the

violation of a person's dignity and the creation of an intimidating, hostile, or aggressive environment, regardless of whether they constitute a form of discrimination.

"Sex-based Harassment" refers to forms of behavior related to a person's gender, which aim to or result in the violation of their personality and the creation of an intimidating, hostile, degrading, humiliating, or even aggressive environment. These forms of behavior include sexual harassment, as defined by the provisions of Law 3896/2010, as well as behaviors related to a person's sexual orientation, expression, identity, or gender characteristics.

"Inappropriate behaviors" associated with incidents of violence and harassment are understood as dangerous, unethical, or illegal practices occurring in the workplace under the employer's responsibility or within the activities of TIF-HELEXPO S.A. These behaviors include, but are not limited to, moral harassment (mobbing), bullying, threats, extortion, insults, defamation, and discriminatory treatment based on gender, sexual orientation, color, age, nationality, religious and/or political beliefs, or the family status of the individual.

4. PREVENTION AND COMBAT MEASURES AGAINST INCIDENTS OF VIOLENCE AND HARASSMENT – AWARENESS AND SENSITIZATION OF STAFF

TIF-HELEXPO S.A., in order to ensure an accessible, safe, and friendly working environment, is committed to guiding, training, and sensitizing its staff on incidents of violence and harassment at work by adopting the following prevention and response measures and mechanisms:

- Planning of annual training programs for executives and employees.
- Encouragement of maintaining a work environment where respect for human dignity, cooperation, and mutual assistance are core values.
- Open communication
- Identification of areas and specialties where employees are most exposed to incidents of violence and harassment
- Regular assessment of the effectiveness of preventive measures and response actions, as well as updating the risk assessment and measures
- Establishment of an internal disclosure/reporting mechanism and investigation of incidents of violence and harassment.

Specifically, until further notice, the responsible internal body for monitoring incidents of violence and harassment is the Committee for Reporting Evaluation, as outlined in TIF-HELEXPO S.A.'s Reporting Management Policy. This Committee is composed of (i) the Company's Compliance Officer, who serves as the head of the Committee and is responsible for the entire process,

(ii) the Head of Internal Audit, (iii) the Head of Human Resources, and will operate as the responsible

internal body for monitoring incidents of violence and harassment in the workplace.

The responsibilities of the monitoring body will include, among others:

- a) Monitoring the implementation of the policy and informing employees,
- b) Evaluating its effectiveness,
- c) Submitting recommendations to any official authority for measures deemed necessary to improve and enhance the protection of victims of violence and harassment in the workplace,
- d) Investigating reports and/or complaints of violence and harassment incidents,
- e) Promoting protective measures for the victim(s), and
- f) Recommending the adoption of corrective measures.

Complaints and reports of incidents of violence and harassment will be accepted, either anonymously or with identification, and in accordance with the reporting management policy, they will be investigated promptly and thoroughly. Following the report or complaint of an incident by an employee of TIF-HELEXPO S.A. and to ensure a healthy working environment, TIF-HELEXPO S.A. may take the necessary and appropriate protective measures to ensure that similar incidents or behaviors do not recur in the future.

These measures may include, but are not limited to: a compliance recommendation, changing the employee's work position, working hours, location, or method of providing work, termination of the employment contract of the employee who engaged in violent or harassing behavior, or termination of the collaboration. TIF-HELEXPO S.A. may, at its discretion, take any of the above-mentioned measures or some other appropriate action.

In any case, the affected individuals have the right to judicial protection and may directly appeal to the Labor Inspectorate (SEPE) and report to the Ombudsman, as entities that handle disputes arising from violence and harassment in the workplace. It is also mentioned that individuals can contact the SEPE complaints hotline via the citizen service line, as well as the immediate psychological support and counseling service for women victims of gender-based violence.

5. ASSESSMENT REPORT OF THE RISK OF VIOLENCE AND HARASSMENT IN THE WORKPLACE

Potential risks of violence and harassment in the workplace will be identified in a unified manner by assessing the risk or potential risk of violence and harassment and developing a relevant prevention strategy to minimize the



actual or potential risks that may arise from these factors. Working conditions, third parties, as well as the abuse of power in the workplace.

The related report on the assessment of violence and harassment risks in the workplace is drafted and updated periodically by the Compliance Department of TIF-HELEXPO S.A. in collaboration with the Human Resources Department. Employees are informed about the various risks arising from their work, including the risks of violence and harassment, including sexual harassment, as well as the prevention methods for these risks.

6. MEASURES FOR EMPLOYEES - VICTIMS OF DOMESTIC VIOLENCE

TIF-HELEXPO S.A. is committed to assisting any employee who has suffered domestic violence by supporting them in any reasonable way and through appropriate means, including, among others: (a) the possibility of implementing flexible work arrangements upon the employee's request (e.g., telecommuting where feasible based on the nature of the work provided, etc.), (b) strengthening security measures in the workplace, and (c) providing psychological support.

7. CONFIDENTIALITY AND MAINTENANCE OF PRIVACY

The reporting and disclosure process for incidents of violence and harassment will strictly adhere to confidentiality terms, ensuring privacy for both the complainant and the accused, as well as protection from retaliation. Furthermore, regarding the content of the report and any information that could lead to the identification of the person being revealed or directly accused, absolute confidentiality will be maintained, in accordance with the relevant policy of TIF-HELEXPO S.A.

In the case that the complaint is made with identification, the identity of the complainant will not be disclosed to anyone other than the authorized individuals responsible for receiving, monitoring, and investigating the complaints, namely the members of the Complaints Evaluation Committee and any specialized external consultants or other staff members of TIF-HELEXPO S.A. who have been specifically invited for the investigation of a particular incident.

By exception, the identity of the complainant may be disclosed if: The complainant consents, to the extent that the consent applies. • The disclosure is required by law. • The complaint has been proven to be fraudulent and is deemed malicious in a substantiated manner.

Disclosure of the identity is considered necessary to prevent or reduce a threat to the safety of the affected person, the employees of the company, or third parties, or to protect the legitimate interests of the company.

The way the protection of information and access for the responsible person in charge of examining each reported incident of violence and harassment in the workplace is ensured is thoroughly detailed in the reporting management process of TIF-HELEXPO S.A.

8. INFORMATION - REFERENCE PERSON

TIF-HELEXPO S.A. designates a person as the Reference Person for the information and guidance of employees regarding the prevention and handling of violence and harassment in the workplace. The Reference Person, with the assistance of the Legal Services Department of TIF-HELEXPO S.A., where necessary, provides interested parties with information about the Company's current Policy and informs the affected individuals covered by this policy about their rights in the event of violations of the Policy and the legislation on the prevention and handling of violence and harassment in the workplace.

The Reference Person is appointed by a decision of the CEO of TIF-HELEXPO S.A., which is communicated to all employees by appropriate means. Until a new decision is issued, the Reference Person is the head of the Human Resources Department.

A written notice is posted in the workplace indicating the Reference Person, the individuals responsible at TIF-HELEXPO S.A. for receiving and handling internal complaints, as well as the contact details of the relevant Authorities.

The competent Authorities for submitting claims related to labor disputes concerning violence and harassment at TIF-HELEXPO S.A. are: A) The Head of the Regional Directorate of Labor Relations Inspection for Central Macedonia, Frangon 14, Thessaloniki 54012, Tel. 2310 517644 B) The Head of the Labor Relations Inspection Department for the Central Sector of Thessaloniki, Prox. Koromila 51, Thessaloniki 54622, Tel. 2310 285328 / 2310 225943 / 2310 226181 / 2310 226186

9. PROCEDURE FOR HANDLING INTERNAL REPORTS

TIF-HELEXPO S.A. designates, by a decision of the CEO, the person or persons responsible for receiving and further managing internal reports and complaints regarding violations of the Policy and legislation on the prevention and handling of violence and harassment in the workplace and informs employees accordingly through appropriate means.

Until a new decision is issued, the Complaints Evaluation Committee is responsible for receiving and managing reports and complaints.



The person responsible for receiving and handling complaints from or against members of the Complaints Evaluation Committee is the CEO of TIF-HELEXPO S.A.

Any interested party within the scope of this policy can report or file a complaint regarding an incident of violence and harassment that they have witnessed, using one of the following communication channels.

Reports can be:

(a) Submitted via the reporting platform at the email address <https://safevoice.growthfund.gr>, **or**

(b) Sent to the company's email address at safevoice@helexpo.gr, **or**

(c) Sent by mail to the company's address, i.e., TIF- HELEXPO S.A., EGNATIA 154, THESSALONIKI, POSTCODE 54631, with the indication "Confidential – Attention Compliance Officer", **or**

(d) Submitted in writing or verbally directly to the Compliance Officer, **or**

(e) Submitted, if they concern employee behavior, to the Disciplinary Supervisor of the company, i.e., the CEO of TIF – HELEXPO S.A., who will forward them to the Compliance Officer.

In cases where the report has not been received through the reporting management platform, it will be recorded by the Compliance Officer of the company. TIF-HELEXPO S.A. may create additional communication "lines" or reporting platforms. The Complaints Evaluation Committee is required to promptly investigate and manage every complaint impartially and with respect for human dignity. The investigation and examination of complaints are carried out impartially and with the protection of the confidentiality and personal data of both the victims and the accused.

The interests of the company, and in cases where such disclosure is required by law.

In any case, the disclosure of the data and findings of the investigation by the Complaints Evaluation Committee to the reporter, the accused, or other involved parties, to the Management, to the company's disciplinary bodies, and to any relevant Authorities, is always done to the extent necessary for the intended purpose, in collaboration with the Legal Department and the Data Protection Officer (DPO), and always taking into account the opinion of the affected person.

If the investigation reveals sufficient evidence to establish a disciplinary offense by a person subject to the company's disciplinary rules, the affected person is promptly informed, and, with their consent, the file is forwarded to the



Disciplinary Supervisor for initiating a disciplinary process against the wrongdoer. The investigation/evaluation report of the Complaints Evaluation Committee serves as a preliminary examination. If the wrongdoer is a third-party employee from a cooperating company, the file is forwarded, with the consent of the affected person, to their employer.

The consent of the affected person is not required if the initiation of the disciplinary process or the forwarding of the file to the third-party employer aims to protect employees or third parties or safeguard the company's interests.

In any case, TIF-HELEXPO S.A. always reserves the right, even without resorting to the disciplinary process, to take any appropriate measures to address and prevent incidents of violence and harassment in the workplace and to protect the affected persons and/or ensure the compliance of the wrongdoers, including compliance warnings, changes to work hours, positions, methods of work delivery, temporary removal from work, as well as termination of the employment contract of the wrongdoer.

Reports and complaints which, within the framework of applying the procedures of this policy, are found to be clearly malicious, will be considered unacceptable and will be further investigated at the discretion of the Committee, both in terms of motivations and the parties involved.

If a complaint is proven to be malicious, the accused party may, upon written request, be informed of the identity of the reporter in order to exercise their rights.

In the case of proven malicious complaints, the Complaints Evaluation Committee will recommend any necessary measures to the Management against the involved party.

In any case, the Complaints Evaluation Committee always reserves the right to suggest preventive, corrective, and restorative measures to the Management, without disclosing specific details of a complaint or investigation, and may implement such measures itself if feasible.

At the same time, if the Management wishes to take legal action against the parties involved to protect the company's legitimate interests, a relevant mandate is issued to the Legal Department.

Finally, the Management will take the necessary actions to eliminate the root cause that led to the report, if possible.

In cases where further legal actions have been taken, the Legal Department monitors their progress, and the Complaints Evaluation Committee maintains communication with the reporter and the accused, if necessary. The involved

Unit(s) will make recommendations for taking the necessary measures to prevent similar incidents in the future.

Subject to the protection of the data of the parties involved, the Compliance Officer regularly informs, at a minimum, on a quarterly basis, the Management and the Audit Committee about the activities of the Complaints Evaluation Committee.

10. OTHER RIGHTS OF THE AFFECTED PARTIES

In addition to the right to report to the competent bodies of TIF-HELEXPO S.A., the affected party also has the following rights:

Any person who, as mentioned above, is covered by the protection of Law 4808/2021 and is affected by an incident of violence or harassment against them, even if the relationship in which the incident or behavior is alleged to have occurred has ended, has the right to resort to judicial authorities and/or to file a complaint before the Labor Inspection and the Ombudsman. Any person who, as mentioned above, is covered by the protection of Law 4808/2021 and experiences an incident of violence or harassment, has the right to leave the workplace for a reasonable period without loss of salary or any other adverse consequence, if they reasonably believe there is an imminent serious danger to their life, health, or safety, especially when appropriate measures have not been taken to restore workplace peace, or when such measures are not sufficient to stop the violence or harassment behavior. In this case, the person leaving the workplace is obliged to notify the Complaints Management Department or the CEO of TIF-HELEXPO S.A. in writing, describing the incident of violence or harassment and the circumstances justifying their belief that there is imminent danger to their life, health, or safety. If the danger no longer exists and the person refuses to return to the workplace, TIF-HELEXPO S.A. may resort to the Labor Inspection to resolve the dispute.

The reporting of incidents of violence or harassment is prohibited from having any negative consequences for the complainant, unless it is proven to be clearly false and malicious. With the above reservation, the reporting or any form of termination of the employment relationship, as well as any other adverse treatment, is prohibited when it is done as a reaction to a protest, complaint, testimony, or any other action of an employee or their representative before a court or other authority, related to the protection against violence or harassment.

11. PROHIBITION OF DISCRIMINATION - SUPPORT AND FACILITATION OF VULNERABLE EMPLOYEES OR EMPLOYEES WITH DISABILITIES AND CHRONIC ILLNESSES

TIF-HELEXPO S.A. is committed to not making any discrimination based on gender, race, color, language, religion, political or other beliefs, national or



social origin, participation in a national minority, property, age, disability, illness, or any other characteristic.

The prohibition of discrimination does not include cases where a specific qualification, such as a degree, age, work experience, special knowledge, or skills, etc., is set as a formal or substantive requirement for hiring, promotion, or continuation in employment, provided that it is justified by a legitimate purpose,

such as the legitimate business interest, work requirements, national employment policies, labor market and vocational training, etc. Additionally, protection from discrimination does not cover individuals who are unable or unwilling to fulfill their basic obligations from the employment relationship.

TIF-HELEXPO SA is required to take all appropriate measures on a case-by-case basis, in order to ensure that employees with disabilities or chronic conditions have access to a job position, are able to perform their duties, and can progress, as well as the opportunity to participate in professional training, provided that these measures do not lead to disproportionate burden.

12. FINAL PROVISIONS

This policy against violence and harassment comes into effect, may be amended, and may be repealed in accordance with the provisions of Law 4808/2021 and the Employment Regulations of TIF-HELEXPO S.A. The full text is sent to the staff via email, incorporated into the Employment Regulations, and is permanently displayed in an accessible and visible location within the facilities of TIF-HELEXPO S.A. Additionally, it is posted on the company's website. Every employee has the right to express their opinions to the relevant authorities. Finally, any employee may, upon request, receive a copy of the Policy.