

**Policy on the Prevention and Protection against violence, harassment,  
and discrimination at work**

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## **A. Introduction**

Our company, under the name "NAVARONE S.A.," of Panama (hereinafter the "Company") with business address at 6 Cheimaras str., 151 25, Amaroussion, Greece, complies with all the measures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and addressing of all forms of violence and harassment, including gender-based violence and sexual harassment.

### **a. Purpose and Scope**

The purpose of this policy is the establishment and consolidation of a working environment that respects, promotes and safeguards human dignity and the right of every human being to a world of work free from violence and harassment. This policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and applies to all employees and individuals working for the Company regardless of their contractual relationship, as defined in paragraph 1 of Article 3 of Law 4808/2021.

The Company expressly and unequivocally declares that all forms of violence and harassment occurring in the course of work, whether related to or resulting from it, by any executive or employee of the Company, whether directed at another executive, employee or third party, including gender-based and sexual violence and harassment, are prohibited and expresses its commitment to addressing and eliminating them. The Company undertakes to receive, investigate, and handle any relevant complaint showing zero tolerance to violence and harassment, with confidentiality and respect for human dignity.

The Company declares that implicitly or explicitly, mocking, indecent, sexual, or racist jokes or comments, the use of offensive language, comments about someone's appearance or character that cause shame or humiliation, monitoring, unwanted verbal or physical sexual attention towards an individual, sending sexually explicit messages via SMS, email, social media, fax, or letter, offensive and persistent inquiries regarding someone's age, marital status, personal life, sexual interests or preferences, as well as similar questions about a person's race or ethnicity, including cultural identity and religion, sexual gestures or persistent proposals for romantic relationships (dating), or threats, implying that providing sexual favors will advance someone's career or that refusing such sexual favors may negatively impact one's professional career within the Company, rude or indecent gestures, physical contact of any unwanted nature, spreading malicious comments or insults towards someone primarily based on discrimination due to age, gender, marital status, cohabitation agreements, pregnancy and maternity, any form of disability, sexual preferences, religion, or beliefs, threats, whether oral or written, insults in public or private, belittlement or ridicule of a person or their abilities, whether privately or in the presence of others, outbursts of anger against someone, persistent or unwanted criticism, exclusion from social events, collective meetings, discussions, and collective decision-making or planning, online harassment, offensive emails, letters, and phone calls, are strictly prohibited.

### **b. Definitions**

#### **1. Violence and Harassment**

Violence and Harassment are forms of behavior, acts, practices, or threats hereinafter referred to, which aim, lead, or may lead to physical, sexual, or economic harm, either individually or persistently.

Harassment also constitutes a form of behavior that aims to or results in the offense to a person's dignity and the creation of an intimidating, hostile, humiliating, degrading, or aggressive environment, whether based on discrimination or not, including gender-based harassment or other forms of discrimination. Harassment, prohibited by this policy, includes, but is not limited to:

- Verbal harassment, including, for example, annoying comments, insults, or accusations;
- Physical harassment, including, for example, physical interference with normal work or movement;
- Visual forms of harassment, such as posters, cartoons, photos, or drawings that are offensive based on legally protected characteristics;
- Retaliation or intimidation in case of reporting or threatening to report any of the aforementioned forms of harassment or for cooperating in the investigation of a harassment incident;
- Gender-based harassment and sexual harassment: Sexual harassment is a form of behavior related to a person's gender that aims to or results in the violation of a person's dignity and the creation of a threatening, hostile, humiliating, demeaning, or aggressive environment. These forms of behavior include sexual harassment as well as behaviors related to sexual orientation, expression, identity, or genetic characteristics. Specifically, sexual harassment is defined as unwanted verbal, psychological, or physical behavior or sexual nature, which includes unwanted sexual advances, solicitation of sexual favors, and any other unwanted physical or verbal behavior of a sexual nature. Such behavior can be caused by a person of any gender and pertains to the harassment of a person of any gender. Examples of sexual harassment include:
  - Offering favors in exchange for sexual services or creating an environment that promotes "sexual interaction" as a means of advancing one's career in the workplace;
  - Revenge or the threat of revenge after rejecting sexual advances;
  - Obscene gestures, the display of sexually offensive graphics in electronic or print form (e.g., emails, pictures, cartoons, posters, etc.), or any other depictions with obscene or sexual references;
  - Derogatory comments, sexually suggestive language, or indecent comments in discussions, letters, invitations, notes, or other comments;
  - Sexual contacts, gestures of a sexual nature, insinuations, touching, pushing, and other forms of unwanted contact. The employee or third party engaging in such prohibited behavior must and will be held fully responsible for their actions.

The above are indicative examples and not an exhaustive list of prohibited acts falling under the definitions of violence and harassment. In this context and in order to avoid misunderstandings and/or misinterpretations in the implementation of this policy, it is clarified that any act within the scope of the management prerogative regarding employee supervision, work performance evaluation and overall presence at work, does not constitute violence and harassment.

## 2. Workplace

For the purposes of this policy, workplace includes:

- Facilities and other spaces where employees work, get paid, take breaks, including personal hygiene areas, company premises, parking areas, offices, or warehouses;
- Spaces related to commuting to and from work and other movements, meetings, conferences, travel, training, events, or social activities related to work; and
- Communication channels related to work, including those operating with the use of new information technology (corporate email accounts, mobile phones etc.).

## **B. Prevention and protection against violence and harassment at work**

### a. Assessment of violence and harassment risks in the workplace

The Company regularly assesses the risks of violence and harassment in the workplace through on-site monitoring of its workspaces, taking into account any relevant risks arising from the nature of its activities, job positions, and factors such as the composition of the workforce, gender, age, and any other characteristics that may constitute grounds for discrimination among employees.

### b. Measures for the prevention, control, limitation, and management of these risks, as well as for monitoring such incidents or forms of behavior.

The Company takes measures for the prevention, control, limitation, and management of these risks, as well as for the monitoring of such incidents or forms of behavior, demonstrating zero tolerance for violence and harassment, acting with confidentiality, discretion, and respect for human dignity.

For example, the Company:

- Promotes a work environment where respect for human dignity, cooperation, courtesy, understanding, trust, and support are fundamental values;
- Maintains and encourages open communication between every employee and the employer, as well as with immediate superiors and colleagues;
- Follows a procedure for managing reports/complaints regarding incidents of violence and harassment;
- Ensures that employees receive appropriate training/information to carry out their duties, especially in tasks where there is a higher risk of violence and harassment;
- Takes technical measures to improve lighting in all its premises and conducts technical surveillance of its key areas to enhance employee safety;
- Supervises the implementation of this policy and takes action against non-compliant employees;
- Guides and supports victims of violence and harassment or victims of domestic violence for their reintegration into the workplace, taking all appropriate measures and making reasonable adjustments to working conditions; and
- Regularly evaluates the effectiveness of preventive and corrective measures taken, re-evaluates/updates risk assessment and measures accordingly.

### c. Actions for informing and raising awareness among the personnel

The Company undertakes to provide its personnel with information in accessible formats and through appropriate means regarding the risks of violence and harassment, as well as information about the preventive and protective measures in place within the Company. This also includes information about the relevant procedures within the Company and the protection measures mandated by law in cases of such incidents.

Specifically, the Company provides informational and awareness-raising actions to its personnel regarding the risks of violence and harassment, using appropriate means (both in print and electronically). It ensures that everyone is aware of the Company's policy and the procedures for cases of violence and harassment so that employees know how and to whom they can turn in the event of such incidents. The Company properly informs the leaders of each department so that they can identify incidents of violence and harassment in the workplace, maintaining open communication with employees.

The Company encourages the participation of its employees and executives in educational programs and seminars related to identifying and managing the risks of violence and harassment in the workplace. The Company also encourages its employees and anyone else associated with it in any way to report incidents of violence and harassment in the workplace of which they have become witnesses.

d. Information about the rights and obligations

The Company provides information about the rights and obligations of its employees and of itself as an employer, as well as individuals exercising managerial rights or representing the Company, to the extent of their responsibility, in the event of an incident, complaint, or report of such incidents, as well as regarding the relevant procedures for receiving and investigating complaints.

Specifically, every employee has the right to a workspace founded on respect for human dignity and is entitled to feel safe and report incidents of violence and/or harassment. At the same time, each employee is obligated to treat their colleagues/co-workers with respect and professionalism and in accordance with this policy, as well as to report any incidents of violence and harassment they become aware of.

In the event that a person is affected by an incident of violence and harassment during a job interview, while providing work, or even if the contract or employment during which the alleged incident or behavior occurred has ended, they have:

- i. The right to seek legal protection,
- ii. The right to file a complaint, lodge a grievance, or submit an application for a labor dispute with the Labor Inspectorate within its jurisdiction,
- iii. The right to report the matter to the Ombudsman within the scope of his authority,
- iv. The right to file a complaint within the Company in accordance with the complaint management policy, and,
- v. The right not to face retaliation or adverse consequences for reporting incidents of violence or harassment to the Company.
- vi. The right to leave the workplace for a reasonable period without any deduction from their salary or other adverse consequences if, in their reasonable belief, there is an imminent danger to their life, health, or safety, especially when necessary measures for their protection have not been taken or when these measures are not sufficient to prevent such violent or harassing behavior. In this case, the individual experiencing violence or harassment is obligated to inform the Company in advance in writing, reporting the incident of violence and harassment and the details that, in their belief, justify the imminent danger to their life, health, or safety.

In any case, when a report or complaint about such behavior is raised within the Company, the victim retains the right to contact any competent authority. The contact information for the competent authorities is as follows:

- Ombudsman's Line: +30 213 13 06 600 (email: [press@synigoros.gr](mailto:press@synigoros.gr))
- Labor Inspection Line through the social services line 1555 (email: [helpdesk@sepenet.gr](mailto:helpdesk@sepenet.gr))
- SOS Line 15900 for immediate psychological support and advice to women victims of gender-based violence.

When the victim claims that an incident of violence and harassment has occurred in accordance with the provisions of the policy, paragraph 1 of Article 24 of Law 3896/2010 (Article 53 of the Individual Labor Law Code, which codifies the aforementioned provision) regarding the burden of proof is applied.

e. Appointment of a designated person to guide and inform employees regarding the prevention and handling of violence and harassment in the workplace

For any information, clarification, or question regarding this Policy, interested parties may contact the HR Department, currently represented by Ms. Iosifina Ghioka and Ms. Marisofi Kirozi via the following channels:

- Telephone: +30 216 5001 289 - +30 216 5001 217 and/or
- Email: [hr@navarone.gr](mailto:hr@navarone.gr), adding the distinctive title “Violence and Harassment at Work” to the Subject field.

The role of the reporting person is to guide and inform employees, whether they report to them based on an incident or complaint related to an incident of violence or harassment or not.

The reporting person is obligated to protect any personal data that may come to their attention while performing their duties.

f. Management of domestic violence incidents

Domestic violence includes all acts of physical, sexual, psychological, and economic violence that take place within the family regardless of whether the perpetrator shares or used to share the same household with the victim. Within the limits of its capabilities, the Company, upon becoming aware of a domestic violence incident, undertakes to take all appropriate actions and make all reasonable adjustments to working conditions, in order to protect employment and support victims of domestic violence and to assist them in their reintegration into the workplace. Support measures for employees who have suffered domestic violence include:

- Flexible working arrangements (e.g. special leave);
- Safety measures at the workplace (e.g. work in a non-isolated area).

g. Optional initial actions to deal with violence and harassment prior to submission of a complaint report

If any employee of the Company believes that they are subject to any form of violence or harassment and wishes for the incident to be addressed, they may follow the steps listed below before formally submitting a whistleblowing report:

- Ask the person(s) causing the problem to stop;
- Submit their dissatisfaction in writing to the person causing the problem;
- Discuss the problem with their supervisors or a member of the HR Department.

## **C. Procedure for receiving and investigating complaints**

a. Submission of complaints

If any employee believes that he/she has experienced an incident of violence and/or any form of harassment or has identified such behavior in the workplace, they may submit a written complaint to the HR Department via sending an e-mail to the e-mail address as mentioned above ([hr@navarone.gr](mailto:hr@navarone.gr)).

The HR Department, with full support from the Company management, will handle the matter with absolute confidentiality, impartiality, and particular sensitivity towards the affected employee.

The Company encourages both named and anonymous reports. The fundamental and inviolable principle is to protect the anonymity and confidentiality of the data of the persons submitting such reports / complaints and ensure that their current position and future professional development are not compromised.

In the event that any other employee of the Company receives such a report, they should send it to the abovementioned email address immediately. Employees need to be encouraged to keep notes on all incidents and actions taken to stop violence and harassment incidents, as well as any support requests they have submitted on the Company's internal communication channels.

In the case of an oral report, the complainant shall be encouraged to submit their detailed report in writing according to the present Policy.

b. Investigation and examination of complaints

The submitted complaint reports shall be evaluated by the HR Department always ensuring impartiality and protection of the confidentiality of the personal data of victims and respondents.

The HR Department investigates the reliability of the report received based on the information provided and if the complaint is deemed reliable, it investigates the case, gathering evidence and findings to determine whether the complaint is confirmed, as well as the importance of the situation.

While the process may vary from case to case, investigations should be done in accordance with the following steps by the HR Department:

- Upon receipt of the complaint, the HR Department will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If the complaint is verbal, the HR Department shall encourage the individual to complete the 'Complaint Form' in writing. If he or she refuses, it will proceed with preparing a Complaint Form based on the verbal reporting;
- Request and review all relevant documents, including all electronic communications or phone records that are relevant to the investigation;
- Conduct interviews with all parties involved, including any relevant witnesses;
- Create a written documentation of the investigation (such as a letter, memo, or email), which contains the following:
  - A list of all documents reviewed, along with a detailed summary of relevant documents;
  - A list of names of those interviewed, along with a detailed summary of their statements;
  - A timeline of events;
  - A summary of prior relevant incidents, reported or unreported; and
  - The basis for the decision and final resolution of the complaint, together with any corrective action(s).
- Keep all the written documentation and associated documents in a secure and confidential location;
- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document;
- Inform the individual who reported of his/her right to file a complaint.

Following the investigation, the HR Department considers all the information and recommends any necessary actions against the person involved, in accordance with the Company's internal procedures.



Reports and complaints which prove to be manifestly malicious shall be considered inadmissible and will be further investigated at the discretion of the HR Department, both in terms of motives and parties involved. In the event of proven malicious complaints, the HR Department shall take any necessary actions against the parties involved.

c. Provisional measures for the complainant

The HR Department shall, if necessary and subject to the agreement with the complainant, take measures to protect the latter until the complaint/report is fully investigated. Actions for the complainant may include special paid leave, remote working subject to the nature of duties or transfer to another office or function.

d. Prohibition of retaliation against the affected person

The Company is committed to complying with the obligation to prohibit retaliation as stipulated in accordance with Article 13 of Law 4808/2021. The Company shall never retaliate or allow retaliation against the complainant of a violence or harassment incident. Unlawful retaliation can be any action that could discourage an employee from coming forward to make or support a violence or harassment claim. The Company protects any individual who has:

- made a complaint of discrimination, violence, or harassment, either internally or at the competent authorities;
- opposed discrimination, violence, or harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager;
- reported that another employee has been discriminated, violated, or harassed; or
- encouraged a fellow employee to report such an incident.

Termination or dissolution in any way of the employment relationship shall be null and void, if it constitutes vindictiveness or retaliatory action in the sense of Article 14 of Law 3896/2010 against the report of a violence and harassment incident under Article 4.

e. Consequences upon the determination of violations

The HR Department shall take necessary, appropriate, and proportionate measures against the employees and anyone associated with the Company in any way, who violate the obligations arising from this policy, to prevent and avoid recurrence of such incident or behaviour in the future.

The measures shall include:

- Encouragement of compliance;
- Change of the position, modification of working hours, relocation or alteration of the method of work provision, as well as the prohibition of access to all or part of the Company's building(s)/facilities,
- Termination of the employment relationship or cancellation of the employment contract with the reservation of the prohibition of abuse of the right under Article 281 of the Civil Code.

This policy is implemented in conjunction with the relevant general legislation for the protection of the employee's privacy and does not affect their legal rights under civil and criminal law.

f. Cooperation and provision of all relevant information to the competent authorities, if requested

The Company assumes the obligation to collaborate with any competent public, administrative, or judicial authority, which, whether ex officio or at the request of the victim within its jurisdiction, seeks the provision of data and information and undertakes the obligation to provide access to this data. For this purpose, all data collected in any form is kept in a dedicated file in compliance with the provisions of Law 4624/2019.

**D. Policy evaluation and optimization**

The Company undertakes to evaluate this Policy in compliance with the requirements of the applicable laws and regulations, ensuring it is constantly up to date. In the event that this Policy needs to be amended, for the purpose of fighting discrimination, violence and harassment and managing internal complaints, the Company shall negotiate and sign the amendments, which will be included as an appendix hereto. The Company shall post this policy and procedure on all internal communication channels so that all employees have knowledge of it.