Policy against discrimination, violence and harassment at work and the Management of internal complaints in the workplace

March 2026 (V2)

Human Resources & Culture Management Department

Policy against discrimination, violence and harassment at work and the Management of internal complaints in the workplace

Pursuant to articles 62 and 63 of Presidential Decree 62/2025 (Gov. Gaz. A' 121)

Attica Group, in compliance with Articles 62 and 63 of Presidential Decree 62/2025 (Gov. Gaz. A' 121), as in force, hereby establishes the present policy for combating discrimination, as well as for combating every form of violence and harassment and for the management of internal complaints regarding incidents of violence and harassment affecting employees of all categories across all companies of ATTICA S.A. HOLDINGS the Group, hereinafter collectively referred to as the Group companies.

The purpose of this policy is: a) to promote equal opportunities for employees and to combat all forms of discrimination; b) to maintain and consolidate a working environment that respects, promotes and safeguards human dignity and maintains a zero-tolerance stance towards every form of violence and harassment in the workplace, expressly including gender-based violence and harassment and sexual harassment; c) to manage internal complaints regarding incidents of violence and harassment.

Attica Group acknowledges that violence and harassment in the workplace constitute, as the case may be, a violation or abuse of human rights, represent a threat to equal opportunities, are unacceptable and incompatible with dignified work, and adversely affect the organization of work and labor relations, as well as employee motivation and productivity.

Furthermore, it acknowledges the importance of developing a working culture based on mutual respect and human dignity in order to prevent incidents of violence and harassment.

This includes any incident of violence or harassment of any nature that occurs in the workplace, during work-related communications, including those conducted through information and communication technologies, as well as outside the workplace insofar as they are work-related (e.g. during commuting to and from work, during training seminars, corporate and social events of the Group's companies, etc.), provided that it is committed by a person who is connected to the Group's companies through an employment relationship of any kind or who is engaged therewith (via third-party service providers, interns, apprentices, volunteers, etc.) or in general by any person associated with the Group's companies in accordance with the provisions of Article 3(1) of Law 4808/2021, as incorporated in Presidential Decree 62/2025.

The Group's companies, recognizing the right of all employees to a work environment free from every form of violence and harassment, declare that they do not permit nor tolerate in any degree such forms of conduct and practices, and that they take appropriate measures to avoid, prevent, control, limit, monitor and address them.

Any person subject to Article 3(1) of Law 4808/2021, as incorporated into Presidential Decree 62/2025, who is affected by an incident of violence and harassment, even if the relationship within the framework of which the conduct is alleged to have occurred has terminated,

is entitled, in addition to judicial protection, to bring an appeal before the Labor Inspectorate and the Greek Ombudsman, as well as to submit a complaint within the Group's companies.

For the purposes hereof, the following definitions are set out below, as referenced in Article 4 of Law 4808/2021, which has been incorporated into Article 62 of Presidential Decree 62/2025 (Gov. Gaz. A' 121), as in force:

"**Violence and harassment**" means any form of conduct, act, practice or threat that is intended to, results in or is likely to result in physical, psychological, sexual or financial harm, whether occurring singly or repeatedly.

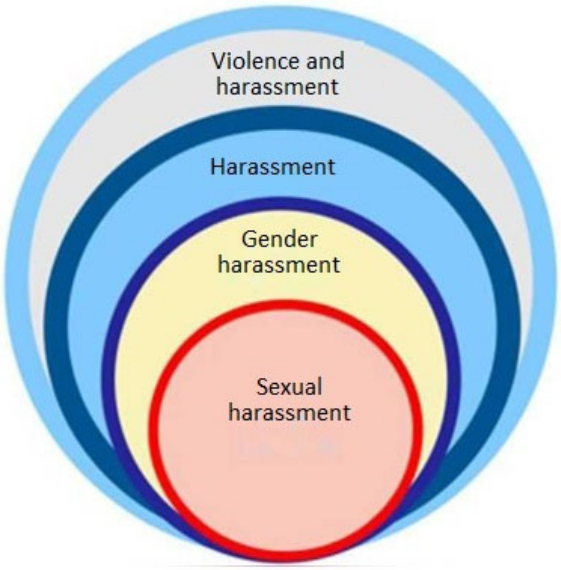
"**Harassment**" means any form of conduct the purpose or effect of which is to violate the dignity of the person and to create an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether it constitutes a form of discrimination and includes harassment based on gender or on other grounds of discrimination.

"**Gender harassment**" means conduct related to the gender of a person, the purpose or effect of which is to violate the dignity of that person and to create an intimidating, hostile, degrading, humiliating or offensive environment, as defined in Article 2 of Law 3896/2010 (A' 107) and Article 2(2) of Law 4443/2016 (A' 232). It also includes forms of conduct causally linked to a person's sexual orientation, expression or gender identity or characteristics.

"**Sexual harassment**" means forms of unsolicited verbal, psychological or physical conduct of a sexual nature, resulting in an affront to a person's personality, especially with the creation of a concomitant intimidating, hostile, degrading, humiliating or offensive environment.

Chart illustrating the relationship between the terms:

"**Violence and Harassment**", "**Harassment**", "**Gender Harassment**", "**Sexual Harassment**"



In order to combat discrimination, violence and harassment in the workplace, the Group's companies have undertaken the actions described in detail in the subsequent sections of this policy, as summarized below:

a) assessment of violence and harassment risks in the workplace;

b) adoption of measures for the prevention, control, mitigation and management of said risks, as well as for the monitoring of such incidents or forms of conduct;

c) information and awareness-raising activities for personnel;

d) provision of information to employees regarding the rights and obligations of the Group's companies and of employees, as well as of persons exercising managerial authority or representing the employer, to the extent and degree of their own responsibility, in the event of the occurrence, reporting or complaint of such incidents, as well as regarding the relevant procedure;

e) designation of a reference person ("liaison") responsible for guiding and informing employees on the prevention and management of violence and harassment in the workplace;

f) adoption, on a case-by-case basis, of appropriate measures or reasonable accommodation in order to protect, to the greatest extent possible, the employment environment and to support employees who are victims of domestic violence.

CHAPTER A
Risk Assessment – Prevention and Information Measures
Rights and Obligations of Employees and the Company
A1. Assessment of the Risks of Violence and Harassment in the Workplace

The Group's companies identify "risks", i.e. factors that may constitute grounds for discrimination, contributing to the occurrence of incidents of violence and harassment (gender, age, color, religious or other beliefs or other characteristics), and focus on the groups of persons most exposed to them. Subsequently, they conduct a risk assessment, for which digital occupational risk assessment tools used by the Group's companies or any other appropriate tool may be employed. Furthermore, the Group's companies carry out risk assessments related to discrimination, violence and harassment in the workplace and adopt appropriate measures to prevent harassment incidents.

Indicatively, technical measures are taken in the workplace (e.g. adequate lighting where required or any other appropriate measures). Furthermore, measures deemed appropriate on a case-by-case basis are adopted concerning rest or dining areas, the scheduling of employee shifts – particularly during night shifts –, business travel, social events of the Group's companies, etc.

Examples of harassment

- Comments about a person's physical appearance or character that cause embarrassment or discomfort.
- Offensive conduct or circulation of offensive or obscene material.
- Insinuations, mockery, obscene or sexual/racist jokes or comments directed against homosexual persons.
- Use of offensive language to describe a person with a disability or to mock a person with a disability.
- Unwanted attention such as stalking, pursuing and unwanted verbal or physical attention.
- Unwanted sexual gestures or persistent "invitations" for dates or threats.
- Sending unwanted messages with sexually explicit content via SMS, email, social media, fax or letter, or making threatening phone calls.
- Arbitrary, offensive and persistent questions about a person's age, marital status, personal life, sexual interests or preferences, as well as similar questions about a person's race or ethnicity, including their cultural identity and religion.
- Insinuations that the acceptance of sexual advances by an employee may advance their career, or that refusal to enter into a sexual relationship may adversely affect it.
- Unwanted looks of a sexual nature, rude gestures, touching or any form of unwanted physical contact of any nature.
- Spreading malicious comments or offending a person (primarily on grounds of discrimination relating to age, race, gender reassignment, type of marriage, civil partnerships, pregnancy and maternity, gender, any disability, sexual preferences, religion or beliefs).

A2. Measures for the prevention, control, limitation and management of said risks, as well as for the monitoring of such incidents or forms of conduct

The Group's companies ensure the implementation of measures aimed at informing and raising awareness among their personnel regarding the prevention and management of violence and harassment in the workplace. To this end, they provide information on the established procedures for reporting and addressing such forms of conduct place at company level. These procedures comply with the provisions of Article 63 of Presidential Decree 62/2025, ensuring confidentiality, impartiality and the protection of the persons involved. Furthermore, as part of their personnel information activities, the Group's companies may, on their own initiative, organize training for their employees for the purpose of preventing, controlling and limiting harassment, discrimination in the workplace and retaliation. In such case, the employees called upon to attend training are obliged to participate in the relevant training days/seminars to be conducted either by the Group's companies or by an associate body (consulting firm, training centre, etc.).

Moreover, if employees express interest and intention to attend training seminars from competent bodies regarding harassment in the workplace as well as domestic violence, the Group's companies encourage further training and facilitate attendance by granting the relevant leave to persons who submit the relevant request.

Training objectives:

a) to contribute to the establishment of conduct standards that promote equality and to foster a change in culture, insofar as it creates or contributes to instances of sexual or any other form of violence and/or harassment;

b) to provide participants with information on the adverse effects of psychological bullying in the workplace;

c) to cultivate and instill in persons employed in positions of responsibility values that will assist them in responding effectively to such incidents and in implementing the procedures aimed at addressing them;

d) to facilitate communication between managers and employees with the employer companies.

In any case, the Group's companies regularly evaluate the effectiveness of the measures adopted and, where deemed necessary, re-assess the risks and adjust the measures accordingly.

The heads of all directorates, divisions and departments of the Group's companies bear the specific responsibility to ensure that this policy and the general measures adopted by each employer Company of the Group with regard to the prevention and limitation of violence and harassment are observed and applied by their subordinate personnel.

Furthermore, said persons are expected to be available so that their subordinate personnel may approach them and express any concerns, complaints and grievances relating to the subject matter of this policy. Said availability is part of the Group's Whistleblowing Policy, as defined in Article 63 of Presidential Decree 62/2025.

A3. Employee Information and Awareness-Raising Activities

The Group's companies provide their personnel with information regarding the risks of violence and harassment, the prevention and protection measures adopted, as well as the procedure followed for the management of complaints concerning such incidents.

Within the framework of the aforementioned information and awareness-raising activities for employees, the Group's companies endeavor to organize targeted meetings with personnel for the prevention and timely management of violence and harassment risks in the workplace. They may also organize relevant seminars in cooperation with consultants or mental health specialists.

A4. Information on the rights and obligations of employees and the group companies, as well as of persons exercising managerial authority or representing each employer company, to the extent and degree of their own responsibility, in the event of the occurrence, reporting or complaint of such incidents, as well as regarding the procedure for addressing them.

The Group's companies declare zero tolerance towards incidents of violence and harassment and inform their personnel about the rights and obligations of employees in the event of the occurrence, reporting or complaint of such incidents, as well as of the procedure for addressing them.

Furthermore, the employees of the Group's companies are obliged to understand the content of this policy, to be aware of their rights and obligations in the event of the occurrence of an incident or conduct falling within the scope of this policy and to follow the instructions and guidance of the employer company on the relevant matter.

Specifically:

1. Every employee or worker or in general any person falling within the scope of Article 62 of Presidential Decree 62/2025 (incorporating the relevant provisions of Article 3(1) of Law 4808/2021) who is affected by an incident of violence and harassment in the workplace during the employment relationship or even if the employment contract or relationship within the context of which the alleged incident or conduct has occurred has terminated, is entitled to:

a) judicial protection,
b) submit a recourse, complaint and request for the initiation of a labor dispute before the Labor Inspectorate, in accordance with applicable legislation;
c) submit a complaint to the Greek Ombudsman, within the scope of their statutory competences, as well as
d) file a complaint within the Group's companies, in accordance with the Whistleblowing Policy, as specified in Chapter B below.

2. Every person subjected to violence or harassment in the workplace is entitled to leave the workplace for a reasonable period of time, without loss of remuneration or any other adverse consequence, provided that, in their reasonable belief, there exists an imminent serious risk to their life, health or safety, in particular where the employer is the perpetrator of such conduct, or where the employer fails to take the necessary appropriate measures to restore workplace peace, or where such measures are insufficient to put an end to the violent and harassing conduct.

3. In this case, the person leaving is obliged to notify in advance the Director of Human Resources and Culture Management of the Attica Group in writing, indicating the incident of violence and harassment

and the circumstances justifying their belief that there is imminent serious risk to their life, health or safety. If the risk no longer exists or has ceased to exist and the person that has left refuses to return to the workplace, the employer company of the Group may refer the matter to the Labor Inspectorate requesting resolution of the dispute.

4. The Group's companies are obliged to take the necessary appropriate and proportionate measures, on a case-by-case basis, against the reported person, in order to prevent the reoccurrence of a similar incident or conduct. Such measures may include a compliance recommendation, a change of position, working hours, place or manner of work, or the termination of the employment or cooperation relationship, subject to the prohibition against the abuse of rights under Article 281 of the Civil Code.

5. Persons in positions of responsibility and persons who generally represent the Group's companies are obliged to lead by example through their own conduct, to intervene in order to prevent harassing and bullying behavior, to immediately report to the Director of Human Resources and Culture Management of the Attica Group any complaint of violence and harassment submitted to them, to communicate high conduct standards to their subordinates and to ensure that a supportive environment exists for their associates/subordinates.

Contact details of public authorities:

- Labor Inspectorate (SEPE): complaints telephone line 1555.
- Emergency psychological support and counselling service for women victims of gender-based violence: SOS line 15900.
- Greek Ombudsman: www.synigoros.gr.

A5. Appointment of a reference person – "Liaison" – for guiding and informing employees regarding the prevention and management of violence and harassment in the workplace

The person designated as competent to guide and inform employees regarding the prevention and management of violence and harassment in the workplace, hereinafter referred to as the "**Liaison**", is Attica Group's ***Director of Human Resources and Culture Management***.

The Liaison, informs and guides personnel regarding the prevention and management of violence and harassment, in the event of occurrence of an incident or the submission of a complaint.

Persons falling within the scope of this policy may contact the designated Liaison via email. With regard to any information that comes to their knowledge, the aforementioned reference person is bound by applicable legislation on confidentiality and protection of natural persons from processing of their personal data.

According to the Whistleblowing Policy, personnel may also contact the Reports Receiving and Monitoring Officer (R.R.M.O.), who provides appropriate information regarding the possibility of submitting a Report and notifies the relevant information in a prominent location on the Company's website.

A6. Employment protection and support of employees who are victims of domestic violence

The Group's Companies actively support victims of domestic violence, taking into account their family and financial circumstances (minor children, or children with disabilities, etc.) and demonstrate the necessary care for the retention of their employment and their smooth reintegration. In order to fulfil said commitment, the Group's companies may, inter alia, undertake the following actions:

- Provide access to flexible forms of employment.
- Provide assistance to facilitate access to support structures.
- Grant special leave, at the request of an employee who has been the victim of domestic violence

CHAPTER B

Receipt and Investigation of Complaints procedure (pursuant to Article 63 of Presidential Decree 62/2025)

B1. Communication Channels – Competent Persons

The Group's companies encourage the submission of complaints regarding all incidents that may constitute violence and harassment or retaliation in response to the reporting of such incidents, irrespective of the person against whom they are directed and regardless of the position or identity of the perpetrator.

Persons who have been subjected to such conduct should submit their reports/complaints directly to the Director of Human Resources & Culture Management.

The procedure for the receipt and management of reports/complaints complies with the provisions of Article 63 of Presidential Decree 62/2025, with due regard to confidentiality and the protection of personal data.

Alternatively, reports/complaints may be submitted through the following communication channels, in accordance with the provisions of the Group's Whistleblowing Policy currently in force:

Written Report

– By letter, submitted in person or by post (signed or anonymous) to the registered offices of the Company, for the attention of the Reports Receiving and Monitoring Officer (R.R.M.O.), in an envelope bearing the marking "For the attention of the R.R.M.O." or any other relevant marking:
Attica S.A. Holdings or Attica Group
1-7 Lysikratous Street, Kallithea, PC 17674
For the attention of the R.R.M.O.

– By email sent to the designated email address: whistleblowing@attica-group.com

Oral Report

– Telephone line assigned to the R.R.M.O.: +30 210 8919180, internal line 1251.
– Personal meeting with the R.R.M.O. following submission of a meeting request by the Reporting Person, which may be submitted to the R.R.M.O. in writing, verbally or via email.

Platform Report

– Report submitted online through the dedicated electronic platform available on the Company's website www.attica-group.com.

B2. Investigation and examination of complaints – Impartiality and protection of confidentiality and personal data

All reports/complaints concerning incidents that may constitute violence and harassment or retaliation in response to the reporting of such incidents are reviewed by the Director of Human Resources and Culture Management.

Reports/complaints are thoroughly investigated by the Group's companies without any submission deadlines. The Director of Human Resources & Culture Management and any persons tasked with the

investigation of a complaint have unrestricted access to the records of the Group's companies, as well as to any audiovisual material collected by them for the security of their premises.

In the event that a complaint is found to be substantiated, the necessary appropriate measures are taken to address it. Furthermore, a new risk assessment is conducted in order to prevent the reoccurrence of a similar incident or conduct.

The investigation of the complaint is concluded primarily with the drafting of a report by the Director of Human Resources & Culture Management, which includes the findings, recommendations and conclusions of the investigation. The final report, accompanied by the relevant documents of the file, is submitted to the Management of the respective employer company of the Group. Where the report has been submitted through the communication channels specified in the Whistleblowing Policy, the R.R.M.O. is notified by email of the completion of the investigation of the complaint.

The Group's companies and the natural persons entrusted with the aforementioned tasks in accordance with the foregoing, are committed to impartially examine the reported events and to maintain the confidentiality of all information that comes to their knowledge during and after the investigation of the complaint/report, to the extent that this does not impede the progress of the investigation and the adoption of compliance and remediation measures, and in any case in strict compliance with the provisions of the General Data Protection Regulation, as in force, with regard to the persons involved. Specifically, the reports or complaints received by the Group's companies, any documents that come into their possession during the investigation and the findings thereof, shall be kept by the Director of Human Resources & Culture Management in a dedicated file, in accordance with the regulation on the protection of personal data as set out in the General Data Protection Regulation, as in force.

This complaint investigation procedure constitutes part of the Group's Whistleblowing Policy and is implemented in accordance with the obligations arising from Article 63 of Presidential Decree 62/2025.

B3. Non-Retaliation

The termination or otherwise dissolution of the legal relationship on which employment is based, as well as any other adverse treatment of a person referred to in Article 3 of Law 4808/2021, is prohibited and invalid, if it constitutes vindictive conduct or retaliation within the meaning of Article 14 of Law 3896/2010 (A' 207) in response to an incident of violence and harassment referred to in Article 4 of Law 4808/2021. Furthermore, any act of retaliation against a person who has submitted a complaint or report regarding violence or harassment in the workplace, or because they participate in the investigation of a complaint, is in violation of this policy and may constitute grounds for the termination of the employment/cooperation relationship with the person responsible, as appropriate. Any act of retaliation must be immediately reported to the persons designated above as complaint recipients and shall also be subject to thorough investigation by the Group's companies and their competent bodies.

B4. Consequences of violation of the prohibition of violence and harassment at work

1. If an employee or person engaged under any other employment arrangement or any person in general subject to Article 3(1) of Law 4808/2021 violates the prohibition of violence and harassment, the Group's companies undertake to take the necessary appropriate and proportionate measures, on

a case-by-case basis, against the reported person, in order to prevent the reoccurrence of a similar incident or conduct and to protect the affected person.

2. The measures against the reported person may include a compliance recommendation, a change of position, working hours, place or manner of work, or the termination of the employment or cooperation relationship, subject to the prohibition against the abuse of rights under Article 281 of the Civil Code.

3. Furthermore, or the Group Companies that have a ***Labor Regulation*** in accordance with the applicable legislation, the procedure provided for in each Regulation shall be followed, with regard to disciplinary offences, disciplinary proceedings and disciplinary penalties, in the context of or following complaints about incidents of violence and harassment at work.

B5. Cooperation with Authorities

The Group's companies undertake to cooperate with and to provide all relevant information and assistance to the competent authorities, upon request. The same obligation applies to the persons entrusted with the receipt and investigation of complaints submitted to the Group's companies regarding violence and harassment in the workplace. To this end, all information gathered in any form is maintained in a relevant file, to which access is granted to the competent authorities upon request, in compliance with the provisions on the protection of natural persons with regard to the processing of personal data.