



# O 1 INTRODUCTION

The group of companies MOTOR OIL (HELLAS) CORINTH REFINERIES SA. ("Group") adopts this policy Against Violence and Harassment, which is adapted to Articles 9 and 10 of Law 4808/2021 (GG A´ 101/19.6.2021), the Decision no. 82063/2021 (GG B´ 5059/1.11.2021) of the Minister of Labor and Social Affairs as well as to international best practices.

The Group, aiming to ensure a working environment in which respect for all prevails, undertakes to take all necessary measures to prevent and tackle any potential or actual form of violence and harassment manifested during work, including gender-based violence and harassment as well as sexual harassment.

# **02**PURPOSE

The purpose of this policy is to create and establish a work environment that respects, promotes and ensures human dignity and the right of every person to a world of work free of violence and harassment.

The Group declares that it recognizes and respects the right of every employee to a work environment free of violence and harassment and emphasizes its non-tolerance of inappropriate behavior of any form and by any person.

# 03 DEFINITIONS

### Violence and Harassment:

Any conduct, act or practice, whether individual or repeated, that is either intended to cause physical, psychological, sexual or financial harm, or leads or is likely to lead to such harm.

Harassment also consists in forms of behavior that are intended to violate the dignity of the person and create an intimidating, hostile, degrading, humiliating or aggressive work environment, including gender-based harassment as well as sexual harassment.

### Gender-based harassment

Any behavior, whether individual or repeated, that is linked to the gender of a person and aims to violate the dignity of that person and create an intimidating, hostile, humiliating, or aggressive environment.

#### Report

The internal oral or written provision of information about violations related to this policy.

### Good faith

The reporting party's reasonable belief, based on the cir cumstances and information available to them, that the information provided is true.

## 04 SCOPE

### The scope of this policy includes:

- all employees and persons employed by the Group, regardless of their contractual arrangement, including those employed under a works contract, an independent service agreement, an employment contract, and those employed through third party service providers;
- ii. individuals undergoing training, including trainees and apprentices, volunteers;
- iii. employees whose employment contract has been terminated;
- iv. prospective employees in a Group company;
- v. individuals who do business or cooperate with the Group.

## 05

## DECLARATION OF ZERO TOLERANCE IN INCIDENTS OF VIOLENCE AND HARASSMENT

The Group, remaining focused on its commitment to respect human rights, explicitly and unequivocally declares that any form of violence and harassment manifested during work, whether connected to it or resulting from it, is strictly prohibited.

The Group opposes any kind of behavior or actions that offend or harm or diminish the personality, dignity and prestige of employees or create an intimidating or hostile work environment for them. The behaviors prohibited by this policy include, but are not limited to:

- · threatened or actual physical violence
- verbal harassment including abusive and derogatory comments
- physical harassment
- aggressive behavior
- overt threats and intimidation
- acts of retaliation
- racist comments
- sexist connotations
- physical harassment and sexual advances
- unethical comments about sexual orientation

The above behaviors are indicative and do not constitute an exhaustive list of prohibited actions. Any of those referred to in Article 4 hereof who engages in such prohibited conduct shall bear full responsibility for their actions.

# PREVENTING AND TACKLING VIOLENCE AND HARASSMENT

AT WORK

### 6.1 Measures to prevent incidents of violence and harassment at work

The Group, having as its primary concern the maintenance of a working environment in which respect for human dignity, cooperation and mutual assistance are basic values, ensures a working environment, accessible, safe and friendly, where the relations between employees, associates, the Management and the members of its companies are distinguished by mutual respect, courtesy, honesty, trust.

### In particular, the Group:

- oversees the implementation of this policy;
- undertakes to implement the necessary appropriate measures and impose appropriate penalties, with the aim of preventing and solving issues of violence and harassment at work;
- within the limits of its possibilities, undertakes to adopt every possible measure and make every reasonable adjustment of working conditions to protect employment and support workers - victims of domestic violence;
- encourages its employees and any third party associated with it in any way to report incidents of violence and harassment in the workplace, if they come to their attention, and is committed to cooperating with any competent authority during the investigation;

- has established the appropriate mechanisms for conducting a thorough and fair investigation of potential reports, following the Policy and Procedure for the Management and Investigation of Reports on Violations of the Regulatory Framework;
- ensures that employees are informed about the content of this policy. The information is provided through informative material, e-mails, newsletters or in another convenient way depending on the category of employees. Also, the information on the Policy is published on the Group's intranet.

# PREVENTING AND TACKLING VIOLENCE AND HARASSMENT AT WORK

### 6.2 Rights and obligations of employees

All employees must comply with this policy and all relevant applicable and current procedures and cooperate with any competent authority during the investigation of any incident of potential violence or harassment by providing the requested information.

Every employee has the right and must report any incident of any form of violence and harassment that has come to their attention, as set out in the Regulatory Framework Violation Reporting Policy. The report should be made in good faith and without delay, as soon as it is noticed.

Employees who experience incidents of violence and harassment, during access to employment or during the employment relationship, or even if the contract or employment relationship under which the incident or conduct allegedly occurred have ended, have the right to appeal to the competent authorities, pursuant to the legislation (a. right to judicial protection, b. right to appeal and submit a complaint and request for a labor dispute to the Labor Inspectorate, within the framework of its statutory powers, c. report to the Ombudsman, within the framework of their statutory powers).

In the event of a violation of this Policy, appropriate corrective, disciplinary and/or other actions shall be taken against the violator.

# **07**REFERENCE PERSON

All the above matters and any similar ones shall be explained by the Human Resources Director of the respective Group company, who, designated as the Reference Person of this Policy, with responsibility and discretion, guides and informs the employee concerned.

# **08**RECEIPT AND EXAMINATION OF REPORTS

If any employee of the Group believes that he/she has suffered violence or any form of harassment, or has witnessed such behavior taking place in the work environment, he/she must follow the detailed provisions of the Group's Reporting Policy for reporting the incident.

The Group has established the appropriate investigation mechanisms, following the Procedure for the Management and Investigation of Reports on Violations of the Regulatory Framework, and treats with absolute confidentiality and discretion all incidents of reports on discrimination, violence and harassment.

Pending the outcome of a potential investigation and with a view to maintaining workplace safety and investigation integrity, the Group may, inter alia, relocate employees or modify their working hours. During this period, partial or total access to buildings and/or facilities may not be permitted.

# **09**RELATED POLICIES

Policy and Procedure for the Management and Investigation of Reports on Violations of the Regulatory Framework (Whistleblowing).





