



HELLAGRO S.A.

POLICY FOR THE PREVENTION AND COMBAT OF VIOLENCE & HARASSMENT IN THE WORKPLACE

CODE: PVH
ISSUE: 1.0
DATE: 01.08.2021

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POLICY FOR THE PREVENTION AND COMBAT OF VIOLENCE & HARASSMENT IN THE WORKPLACE



1. PURPOSE

The purpose of this policy is to prevent and combat all forms of discrimination based on personal characteristics and choices, as well as any violence and harassment that occurs during work, is related to it, or arises from it.

2. SCOPE

The management and members of Hellagro S.A. (the “Company”), employees under an employment contract, service providers under salaried mandate agreements, project-based contracts, independent service agreements, and temporary employment contracts, individuals employed through third-party service providers, interns and apprentices, former employees of the Company, job applicants, and other individuals who interact or collaborate with the Company.

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3. ZERO TOLERANCE STATEMENT ON DISCRIMINATION, VIOLENCE, AND HARASSMENT - RISK ASSESSMENT

Hellagro S.A. expresses its commitment to addressing and eliminating discrimination, violence, and harassment in the workplace, aiming to ensure a work environment where respect for human dignity prevails and no discrimination based on personal characteristics or choices is tolerated.

It is explicitly and unequivocally stated that all forms of discrimination, violence, and harassment that occur during work, are related to it, or arise from it, are strictly prohibited.

Indicatively, and without limitation, the Company strictly prohibits the following: innuendos, mockery, obscene, sexual, or racist jokes or comments, the use of offensive language, remarks about someone's appearance or character that cause embarrassment or discomfort, stalking, harassment, and unwelcome verbal or physical attention towards an individual.

It also prohibits the sending of sexually explicit messages via SMS, email, social media, fax, or letter; offensive and persistent questions about a person's age, marital status, personal life, sexual interests or preferences, cultural identity, or religion; sexual gestures or persistent requests for dates or threats; insinuations that sexual favors may advance a person's career or that refusing sexual relations could negatively affect their professional growth within the Company.

Additionally, the Company does not tolerate rude gestures, touching, or any form of unwanted physical contact; the spreading of malicious comments or insults, particularly those related to discrimination based on age, gender, marital status, civil partnerships, pregnancy and motherhood, disability, sexual orientation, religion, or beliefs; verbal or gestural threats; public or private insults; belittling or ridiculing a person or their abilities, whether in private or in front of others; angry outbursts directed at someone; persistent or unjustified criticism; exclusion from social events, workgroup meetings, discussions, collective decision-making, or planning; cyberbullying; and offensive electronic messages or phone calls.

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The Company is committed to receiving, investigating, and handling any related complaints, demonstrating zero tolerance for discrimination, violence, and harassment, with confidentiality and respect for human dignity. It is also committed to not obstructing the receipt, investigation, or management of these complaints.

The Company is further committed to providing support and access to any relevant public, administrative, or judicial authority during the investigation of any incident of violence or harassment.

For employees and those associated with the Company who violate the obligations outlined in this Policy, appropriate and proportional measures will be taken, as needed, to prevent and avoid the recurrence of similar incidents or behavior.

In order to combat discrimination, violence, and harassment, the Company has established a comprehensive mechanism for reporting, managing, and investigating complaints, including the implementation of dedicated reporting channels and the creation of a network of Policies and Procedures. Specifically, the Reporting Policy outlines the Company's principles for both preventing and resolving issues related to violence and harassment in the workplace. The detailed Reporting Management and Internal Investigation Procedure outlines the specific steps that any complainant must take, as well as the responsibilities of the Company's designated body and the actions it must take to ensure effective handling of related incidents.

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4. DEFINITIONS

4.1 DISCRIMINATION

Discrimination is defined as discrimination based on gender, race, color, ethnic or social origin, genetic characteristics, language, religion or beliefs, political opinions, disability or health condition, age, or sexual orientation.

4.2 VIOLENCE AND HARASSMENT

Violence and Harassment refer to forms of behavior, acts, practices, or threats thereof, aimed at, leading to, or likely to lead to physical, psychological, sexual, or economic harm, whether occurring as isolated incidents or repeatedly.

Harassment also refers to forms of behavior that aim to or result in the violation of an individual's dignity and the creation of a fearful, hostile, degrading, humiliating, or aggressive environment, regardless of whether they constitute a form of discrimination. This includes harassment based on gender or other grounds of discrimination.

The harassment prohibited by this policy includes, but is not limited to:

- Verbal harassment, including, for example, offensive comments, insults, or accusations.
- Physical harassment, including, for example, physical interference with normal work or movement.
- Visual forms of harassment, such as posters, cartoons, caricatures, photographs, or drawings that are degrading based on characteristics protected by law.
- Retaliation or bullying for reporting or threatening to report any of the aforementioned forms of harassment, or for cooperating in the investigation of a harassment incident.



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4.3 GENDER-BASED HARASSMENT & SEXUAL HARASSMENT

Gender-based harassment refers to behaviors related to a person's gender, which aim to or result in the violation of that person's dignity and the creation of a fearful, hostile, degrading, humiliating, or aggressive environment. These behaviors include sexual harassment, as well as behaviors related to a person's sexual orientation, gender expression, gender identity, or gender characteristics.

Specifically, sexual harassment is defined as any unwanted sexual behavior, including unwelcome sexual advances, requests for sexual favors, jokes with sexual innuendos related to sexual behaviors, and any other unwanted physical or verbal sexual acts. Such behavior can be expressed by an individual of any gender. For explanatory purposes, some examples of sexual harassment include the following:

- Offering benefits (e.g., promotion or salary increase) in exchange for sexual favors or creating an environment that promotes "sexual contact" as a means for professional advancement in the workplace.
- Retaliation or threats of retaliation following the rejection of sexual advances.
- Visual behavior: obscene gestures, displaying sexually offensive graphic materials in electronic or print form (e.g., emails, voicemail, books, files, photos, etc.), cartoons or posters, or any material with obscene or sexual innuendos.
- Verbal behavior: degrading comments, sexual innuendos, the use of sexual "language" or "jokes" with sexual content.
- Oral sexual harassment or proposals.
- Verbal sexual abuse: sexual comments about a person's body, the use of sexually degrading remarks in describing a person, sexually suggestive or obscene comments in conversation, letters, invitations, notes, or other remarks, adjectives.
- Physical contact: touching, pinching, sexual gestures, slapping, grabbing, pushing, etc.

The above acts are illustrative and do not constitute an exclusive list of prohibited actions. The employee or third party engaging in such prohibited behavior shall bear full responsibility for their actions.

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4.4 RETALIATION

The Company also prohibits any employee or third party, connected in any way with them, from engaging in retaliatory actions against another employee or third party who opposes violence or any form of harassment, submits a complaint, gives testimony, assists, or participates in any investigation process of an incident.

5. MEASURES FOR THE PREVENTION, CONTROL, AND MITIGATION OF RISKS - AWARENESS & INFORMATION ACTIONS

All employees and those connected in any way with the Company are required to comply with this policy.

The policy applies both in the workplace and in environments related to corporate meetings, conferences, business trips, and work-related events, whether on the Company's premises or off-site, whether in-person, online, or by phone.

The Company ensures a work environment that is accessible, safe, and friendly, where relationships among employees, collaborators, management, and company members are characterized by mutual respect, courtesy, honesty, understanding, trust, cooperation, and support.

The Company, within its capabilities, takes all appropriate measures and makes reasonable adjustments to working conditions to protect employment and support employees who are victims of domestic violence.

The Company takes all necessary measures to inform and raise awareness among its employees, using appropriate means (e.g., email communication) to combat violence and harassment. It ensures that everyone is familiar with the Company's policy and procedures regarding incidents of violence and harassment and knows where they can turn in the event of such occurrences.

The Company trains its management to recognize discrimination, violence, and harassment in the workplace and to provide the necessary support to its staff and collaborators.

The Company encourages its employees and any third party connected in any way with it to report incidents of discrimination, violence, and harassment in the workplace that they may witness.

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6. REPORTING, INVESTIGATION, AND HANDLING OF COMPLAINTS

If any employee of the Company or any third party connected in any way with it believes they have been subjected to discriminatory treatment, violence, or any form of harassment, or if they have observed such behavior taking place in the workplace, they must follow the steps outlined in the Report Management and Internal Investigation Procedure to report the incident. The Company has established appropriate mechanisms for conducting a fair, timely, thorough, and objective investigation, following the said Procedure. Additionally, all necessary measures have been taken to ensure the cooperation of all parties involved, whether employees or third parties, in accordance with the aforementioned process. The Company will handle the management of any reported incidents of discrimination, violence, and harassment with the utmost confidentiality and discretion.

The individuals who have submitted reports will be informed of the receipt of their report and periodically updated on the progress of the investigation, in line with the Report Management and Internal Investigation Procedure. Upon completion of the investigation, the Company will communicate the results of the investigation as soon as it is practically feasible and appropriate.

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If any employee of the Company or any third party connected in any way with it believes they have been subjected to retaliatory behavior as a result of submitting a report or providing assistance in the investigation of incidents of discrimination, violence, or harassment, they must immediately follow the procedure outlined in the Company's Reporting Policy to report the retaliatory incident. Complaints regarding behaviors that violate this policy will be accepted in writing, either anonymously or with identification, based on the reporting policy, and will be promptly and thoroughly investigated.

To maintain workplace safety and the integrity of investigations, the Company may, among other things, transfer employees or adjust their working hours while awaiting the outcome of the investigation. During this period, partial or full access to buildings and/or facilities may be restricted.

If the investigation results show that an incident of discriminatory treatment, violence, harassment, or retaliation has occurred, the Company will take appropriate corrective, disciplinary, and/or other actions against the perpetrator.

These actions may include (but are not limited to):

- a. disciplinary sanctions, b. change of position, working hours, location, or manner of work, c. termination of employment or cooperation agreements, d. legal actions.

In any case, the perpetrator may also be liable to criminal or civil responsibility under the applicable law.

This Policy applies in parallel with the applicable general legislation for the protection of the employee's personality and does not affect their legal rights under civil and criminal law, as well as their right to submit a complaint before the competent supervisory authority.

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7. MALICIOUS COMPLAINTS

Complaints that are proven to be malicious will be considered unacceptable and will be further investigated at the discretion of the Company, both in terms of motives and the parties involved, in order to restore order using any legal means and measures.

8. FURTHER INFORMATION - CONTACT PERSONS

Any questions related to the execution or interpretation of this Policy should be submitted to the Company's Director of Business Excellence, who is designated as the responsible person (Point of Contact) for **informing and providing advisory guidance** to the staff.

For issues and complaints related to the prevention and handling of violence and harassment in the workplace, the responsible person is the Director of the Financial Department, as described in the Reporting and Internal Investigation Process.

9. RECORDS OF REVISION TABLE

VERSION	DATE	DESCRIPTION OF REVISION
1.0	08/2021	ISSUE

HELLAGRO S.A.

CONTACT US

Headquarters: 6, Vouliagmenis Ave., 16675 Glyfada
+30 210 9635564
www.hellagro.gr
info@hellagro.gr

