



HUMAN RIGHTS POLICY

MODIFICATIONS TABLE

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1		HR Department	1/9/2023	D. MALAMOS, CEO	Initial version

TABLE OF CONTENTS

Introduction 4

Scope..... 4

Principles..... 4

Human Rights..... 4

1. Harassment-free workplace based on principles of justice and freedom of expression 4

2. Health & safety in the workplace..... 4

3. Inclusion, equal opportunities, protection from discrimination 5

4. Prohibition of child labor 5

5. Prohibition of forced labor and human trafficking 5

6. Respect for trade union freedom 5

7. Disciplinary practices 5

Responsibilities and authorities..... 5

Implementation, monitoring, and modification of the policy 5

Introduction

The Human Rights Policy is an integral part of the strategic framework of the Thrace Group. It governs and integrates into all processes, policies, and business activities of the Group, binding all its member companies.

Scope

This policy applies to all employees of the Group and to all direct and indirect collaborators involved with the workforce throughout the entire supply chain.

Principles

Based on the Code of Ethics and Conduct, the Group demonstrates zero tolerance on workplace harassment, any kind of discrimination (race, gender, religion, nationality, age, disability, orientation, etc.), as well as forced and child labor, both within the Group's companies and throughout the entire supply chain.

The Group applies selection criteria to avoid engaging work with partners at high risk of human rights violations. It is committed to continuously improving actions and controls related to human rights in its interactions with suppliers and collaborators.

The Group is committed to recognizing, assessing, preventing, and eliminating the risks of human rights violations. It exercises due diligence and takes immediate corrective actions to address any incidents. Specifically, the Group commits to:

- Keeping employees informed through training
- Promoting respect and protection of Human Rights across all activities.
- Promptly addressing incidents through a mechanism for reporting violations, allowing employees to express their concerns and report incidents of Human Rights violations.
- Commits to investigating and addressing employees' concerns and resolving complaints and taking corrective actions.

Human Rights

1. Harassment-free and fair workplace, respecting freedom of opinion and expression

The Group is committed to maintaining a respectful, trustful, and fair work environment. It safeguards the well-being and balance between professional and personal life, ensuring decent working conditions and fair compensation in accordance with applicable laws and labor practices (working hours, leaves, overtime, etc.). It also encourages freedom of speech and expression of all opinions without fear of retaliation or negative consequences. The Group shows zero tolerance for offensive or inappropriate behavior, unfair treatment, or reprisals of any kind. Based on the Code of Ethics and Conduct and the Employment Regulation, physical or verbal harassment with sexual, racist, or defamatory characteristics is prohibited in the workplace and in any work-related circumstances outside the workplace.

2. Health & safety in the workplace

The health, safety, and well-being of employees, as well as the health and safety of collaborators entering our facilities, are of top priority for the Group. The Group fosters a safety culture by focusing on prevention, applying high health and safety standards, systematically assessing risks, regularly training personnel, and providing all necessary personal protective equipment.

3. Inclusion, equal opportunities, protection from discrimination

The Group is committed to providing equal opportunities and prohibits all forms of discrimination. Recruitment and hiring processes, access to training and education, performance evaluations, compensation, and the entire work life of employees are protected from discrimination due to race, gender, color, national or social origin, religion, age, disability, sexual preferences, and political beliefs. The Group is committed to operating inclusively and taking appropriate measures to eliminate all forms of discrimination in employment, equal pay for equal work, professional education, and training, as well as decision-making processes.

4. Prohibition of child labor

The Group complies with legal minimum age limits in employee recruitment and prohibits the employment of minors under the age of 18 in all its facilities. It fully adheres to the 10th Principle of the United Nations Global Compact, which advocates zero tolerance for incidents and conditions of child labor across all activities.

5. Prohibition of forced labor and human trafficking

The Group is committed to taking all necessary measures to avoid any direct or indirect involvement in any form of forced or compulsory labor and human trafficking. It prohibits the exploitation of any person and the use of any form of forced or compulsory labor, demonstrating zero tolerance for incidents and conditions that may facilitate any form of forced labor, without exceptions.

6. Respect for union freedom

The Group recognizes and respects the fundamental right to unionize freely and the right to collective bargaining within the framework of national legislative regulations and existing agreements, without fear of retaliation or harassment. In cases where employees are represented by a recognized union, the Group is committed to an open and constructive social dialogue based on mutual trust with duly elected representatives.

7. Disciplinary practices

The Group is committed to treating everyone with dignity and respect. In this context, it implements training practices aimed at preventing unacceptable behaviors in accordance with the legislation and values of the Group. In cases where unacceptable behaviors are observed, disciplinary practices and procedures stipulated in the employment regulations are applied. In situations requiring the implementation of disciplinary measures, the Group is committed to respecting the rights of employees without retaliation or negative consequences. The Group may apply disciplinary practices where necessary depending on the results of the investigation and the severity of the offense.

Responsibilities and authorities

The Chief Executive Officer ensures that the Group conducts its operational activities with absolute respect for Human Rights, in collaboration with the Human Resources Department and the Management Executives.

Implementation, monitoring, and modification of the policy

The Chief Executive Officer monitors the compliance with the policy, with the support of the Human Resources Department. The current policy is periodically reviewed and electronically maintained.