

Η FARIA RENEWABLES S.A. δραστηριοποιείται στον κλάδο των ΑΠΕ, με πρωταρχικό μέλημα την ικανοποίηση των απαιτήσεων των ενδιαφερομένων μερών και την συνεχή βελτίωση του Συστήματος Διαχείριση της Ποιότητας, του Περιβάλλοντος και της Εργασιακής Ασφάλειας & Υγείας.

Στο πλαίσιο αυτό, αποτελεί δέσμευση για τη διοίκηση ότι η Εταιρία:

- Παρακολουθεί, ενημερώνεται κι εφαρμόζει τις νομικές, κανονιστικές και άλλες εφαρμοστέες απαιτήσεις που τη διέπουν.
- Παρέχει τους κατάλληλους πόρους για την παροχή των παραγομένων προϊόντων και υπηρεσιών, εστιάζοντας στις απαιτήσεις και την ικανοποίηση των πελατών, αποσκοπώντας στη μακροχρόνια συνεργασία μαζί τους, χωρίς λάθη, παραλείψεις και παράπονα.
- Παρέχει τους κατάλληλους πόρους για την προστασία του περιβάλλοντος από ρύπανση λόγω των δραστηριοτήτων και διεργασιών της, προωθεί την αειφόρο χρήση των πόρων αυτών στο πλαίσιο του δυνατού καθώς και την ανακύκλωση, αποσκοπώντας να συμβάλει στη μείωση της κλιματικής αλλαγής και την προστασία της βιοποικιλότητας και των οικοσυστημάτων, με όποιο άμεσο ή έμμεσο τρόπο τα επηρεάζει.
- Παρέχει τους κατάλληλους πόρους για την προστασία της υγείας και της ασφάλειας εργαζομένων, συνεργατών και τρίτων λόγω των δραστηριοτήτων και διεργασιών της, προωθεί υγιές κι ασφαλές εργασιακό περιβάλλον για όλους τους εμπλεκόμενους στις διεργασίες και τις δραστηριότητές της, αποσκοπώντας να συμβάλει στη μείωση των εργατικών ατυχημάτων και των επαγγελματικών ασθενειών με στόχο κανένα ατύχημα και καμία βλάβη στον άνθρωπο.
- Παρέχει τους κατάλληλους πόρους για την εκπαίδευση και διαρκή επιμόρφωση του προσωπικού, την ενημέρωση, τη διαβούλευση και τη συμμετοχή των εργαζομένων σε θέματα που άπτονται το Ενοποιημένο Σύστημα Διαχείρισης, καθώς και σε επιμέρους θέματα που αφορούν στη διαρκή βελτίωση των επιμέρους διεργασιών και δραστηριοτήτων της Εταιρίας.
- Δεσμεύεται για την ορθή εφαρμογή, τήρηση, έλεγχο και συνεχή βελτίωση του Ενοποιημένου Συστήματος Διαχείρισης που έχει αναπτύξει σύμφωνα με τα πρότυπα ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 το οποίο είναι εναρμονισμένο με τις ανάγκες και τους στόχους της, καθώς και με τις ανάγκες και προσδοκίες των ενδιαφερομένων μερών της.

Η παρούσα Πολιτική είναι διαθέσιμη σε όλα τα εσωτερικά κι εξωτερικά ενδιαφερόμενα μέρη της επιχείρησης, κοινοποιείται όπου κι όποτε ζητηθεί, αναθεωρείται όποτε κριθεί απαραίτητο και εφαρμόζεται μέσω της συνεχούς ενημέρωσης, εκπαίδευσης και καταλληλότητας της επάρκειας του προσωπικού της, σε όλες τις δομές της.

FARIA RENEWABLES S.A. operates in the renewable energy sector, with a primary focus on meeting the needs of stakeholders and continuously improving its Quality, Environmental, and Occupational Health & Safety Management System. In this context, the management is committed to ensuring that the Company:

- Monitors, updates, and implements the legal, regulatory, and other applicable requirements that govern its operations.
- Provides the necessary resources for delivering products and services, focusing on customer requirements and satisfaction, aiming for long-term collaboration without errors, omissions, or complaints.
- Allocates appropriate resources to protect the environment from pollution due to its activities and processes, promotes the sustainable use of these resources where possible, and encourages recycling, aiming to contribute to climate change mitigation and the protection of biodiversity and ecosystems, in any direct or indirect way that affects them.
- Ensures the provision of suitable resources for the health and safety of employees, partners, and third parties due to its activities and processes, promoting a healthy and safe working environment for all involved in its processes and activities, aiming to reduce workplace accidents and occupational diseases, with the goal of zero accidents and no harm to individuals.
- Provides the necessary resources for the training and continuous education of its personnel, ensuring communication, consultation, and participation of employees in matters related to the Integrated Management System, as well as in specific issues concerning the continuous improvement of the Company's processes and activities.
- Commits to the proper implementation, maintenance, control, and continuous improvement of the Integrated Management System developed according to the ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 standards, which aligns with its needs and objectives, as well as the needs and expectations of its stakeholders.

This Policy is available to all internal and external stakeholders of the Company, communicated whenever requested, reviewed as necessary, and implemented through continuous updates, training, and the adequacy of its personnel across all structures.

Effective from 01/06/2024

# COMPANY POLICY OF “FARIA Renewables S.A.” TO COMBAT VIOLENCE AND HARASSMENT IN THE WORKPLACE AND HANDLING INTERNAL COMPLAINTS

Telephone line for complaints of the Independent Authority of Labour Inspection through the citizen service line **1555 and for the direct psychological support and counseling service for women victims of gender-based violence SOS Hotline 15900**

This Policy has been drafted in the context of the implementation of Law 4808/2021, Government Gazette A' 101/19.06.2021, which ratified Convention 190 of the International Labour Organization on the elimination of violence and harassment in the world of work.

# Contents

|  |           |
|--|-----------|
| <b>BUSINESS BASICS .....</b>   | <b>2</b>  |
| <b>CHAPTER A: PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK .....</b>         | <b>2</b>  |
| <b>Article 1: INTRODUCTION – BASIC PRINCIPLES.....</b>                                   | <b>2</b>  |
| <b>Article 2: PURPOSE.....</b>   | <b>3</b>  |
| <b>Article 3: KEY CONCEPTS - EXAMPLES .....</b>  | <b>4</b>  |
| <b>Article 4: SCOPE – POLICY ADDRESSEES.....</b>   | <b>7</b>  |
| <b>Article 5: RESPONSIBILITIES .....</b>   | <b>8</b>  |
| <b>Article 6: RESPONSIBILITIES OF AN OCCUPATIONAL DOCTOR .....</b>                       | <b>9</b>  |
| <b>CHAPTER B: HANDLING OF COMPLAINTS/PETITIONS .....</b>                                 | <b>10</b> |
| <b>Article 1: PROCEDURE FOR RECEIVING AND DEALING WITH INTERNAL COMPLAINTS.....</b>      | <b>10</b> |
| <b>Article 2: PROCEDURE FOR INVESTIGATING COMPLAINTS/PETITIONS .....</b>                 | <b>10</b> |
| <b>Article 3: DECISION-MAKING PROCEDURE AND IMPOSITION OF DISCIPLINARY SANCTIONS ...</b> | <b>11</b> |
| <b>Article 4: ANCILLARY APPROPRIATE MEASURES IN CASE OF VIOLATION OF POLICY .....</b>    | <b>13</b> |
| <b>CHAPTER C: FINAL PROVISIONS .....</b>   | <b>14</b> |
| <b>Article 1: POLICY REVIEW AND INSPECTION .....</b>                                     | <b>14</b> |
| <b>Article 2: ENTRY INTO FORCE .....</b>   | <b>15</b> |

## BUSINESS BASICS

**Company - Name:** "FARIA Renewables S.A.", ("Company")

**VAT number:** 802079239

**ADDRESS:** Karolou Dil 31-33, Thessaloniki

## CHAPTER A: PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK

### Article 1: INTRODUCTION – BASIC PRINCIPLES

**a)** The Company under the name "FARIA Renewables S.A.", with activity (indicatively): the production of electricity from renewable energy sources, **fully complying with the provisions of Law 4808/2021** on Labor Protection and the ratified Convention 190 of the International Labour Organization on the elimination of violence and harassment in the world of work, undertakes, through this Policy, to have adopted and comply with all measures and measures obligations relating to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and handling of all forms of violence and

harassment, including gender-based violence and harassment and sexual harassment and that it applies articles 9 and 10 of the present Law.

**b)** The Company's zero tolerance for behaviors of any kind of harassment, violence and discrimination within the workplace is hereby declared and the rights and obligations of employees and the employing Company for the prevention and treatment of such incidents & forms of behavior are specified.

In particular, the Company recognizes:

- the right of everyone to be employed in a workplace free from discrimination, violence and harassment, including gender-based harassment and sexual harassment;
- that violence, harassment and discrimination in the workplace constitute a violation of constitutionally guaranteed fundamental human rights and that violence and harassment constitute a threat to equal opportunities;
- the importance of a work culture based on mutual respect, human dignity and equal opportunities to prevent violence, harassment and any discrimination;
- that violence, harassment and discrimination in the workplace adversely affect the mental, physical and sexual health of the individual,
- that violence, harassment and discrimination are incompatible with the promotion of sustainable businesses and have adverse effects on work organisation, labour relations, employee motivation and the commercial reputation and credibility of the Company.

## **Article 2: PURPOSE**

**a)** The purpose of this policy is to create and consolidate a coherent and modern working framework, which respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence, harassment and discrimination. In this context, the Company declares that it recognizes and respects the right of every employee to a working environment, free from all forms of violence and harassment and that it does not tolerate any such conduct by any person.

**b)** With this Policy, the Company:

- is committed and dedicated to ensuring and maintaining a healthy and safe working environment, which strongly and actively supports equal opportunities, the uniqueness of the individual and human dignity,
- prohibits and declares zero tolerance towards violence, harassment and discrimination in the workplace;
- specifies precisely the rights and obligations of employees in order to prevent and respond to such incidents and behaviour,
- ensure the protection of employment and the support of employees who are victims of domestic violence, as far as possible, by any appropriate means.

## **Article 3: KEY CONCEPTS - EXAMPLES**

### **I. Violence and harassment**

#### **A. Definition:**

The concept of violence and harassment includes unacceptable forms of behaviour and practices or threats thereof, whether occurring individually or repeatedly, which aim, lead to, or are likely to lead to, physical, psychological, sexual or economic harm and includes gender-based violence and harassment.

#### **B. Illustrative examples:**

- aggressive or threatening behavior,
- spreading malicious rumors about an individual, excluding or isolating them socially or derogatory comments concerning gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression or any other legally protected characteristic of another person;
- use of offensive humour, including racist, religious, sexist or ethnicity-based jokes;
- public ridicule of another person,
- downloading, posting, displaying, publishing, photographing, printing, distributing pornographic, obscene, offensive or objectionable material or material of a national, religious or racist nature;
- continuous and suffocating monitoring and supervision,
- destruction, concealment or theft of personal belongings or work equipment with the aim of (financial) harming the person;
- exclusion of applications for leave, training or promotion in an abusive, unfair and arbitrary manner;
- physical abuse.

### **II. Gender-based violence and harassment**

#### **A. Definition:**

The concept of gender-based violence and harassment or otherwise gender-based violence and harassment includes forms of conduct related to a person's gender, which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct includes sexual harassment as well as conduct related to a person's sexual orientation, expression, gender identity or sex characteristics.

## **B. Illustrative examples:**

- derogatory comments or jokes about a person's gender, gender identity or gender expression or sexual orientation;
- aggressive behavior due to a person's gender, gender identity, gender expression or sexual orientation.

## **III. Sexual harassment**

### **A. Definition:**

The concept of sexual harassment includes any form of unwanted verbal, psychological or physical conduct of a sexual nature, the effect of which is to offend the personality of a person, in particular by creating an intimidating, hostile, degrading, humiliating or offensive environment around him/her.

### **B. Illustrative examples:**

- explicit sexual advances, requests for sexual concessions, or unwanted dating demands;
- sending sexual/pornographic images, photos, texts or e-mail messages;
- sexual innuendo, comments, epithets, obscene or defamatory expressions with sexual innuendo, "teasing" or "jokes" of sexual content;
- obscene gestures, images, photographs or drawings with obscene or sexual insinuations;
- inappropriate or derogatory comments about a person's appearance or attire;
- Unwanted physical contact, such as "light tapping", groping, touching or pinching.

## **IV. Distinction**

### **A. Definition:**

i) **Direct discrimination** is defined when a person is treated less favourably or unequally than another person in a similar situation has been or would be treated because of a particular characteristic of that person, such as sex, age, colour, origin, sexual orientation, gender identity, religious or political opinion, but which is protected (protected characteristic).

ii) **Indirect discrimination** is when an apparently neutral provision, criterion or practice may place persons on grounds of sex, age, origin, sexual orientation, gender identity, religious or political belief at a particular disadvantage compared with other persons, unless such provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

## **B. Illustrative examples:**

- obstruction of the advancement of a person due to age, gender, origin, religion, political beliefs,
- non-access of a person to privileges and facilities to all staff due to gender, age, sexual orientation, gender identity, religious beliefs.

## **Conclude:**

### **IT DOES NOT CONSTITUTE unacceptable conduct of violence and harassment (indicatively):**

- Direct supervision of employees, including setting performance expectations;
- Taking measures to correct the employee's performance, such as putting him in a process - performance improvement plan,
- The assignment of responsibilities and guidance,
- The request for updates and progress reports,
- The granting or refusal of authorization,
- The request for documentation of absence from work for health reasons, based on the current provisions,
- The moral and/or financial reward of excellent employee performance,
- To provide constructive feedback on work performance.

## **V. Assessment of risks of violence and harassment at work**

Most employees of the Company (regardless of their legal form of employment), apart from their interaction with each other in the same workplace, come into contact with a wider public (customers, suppliers, etc.). The estimated relative risks of violence and harassment (regardless of whether they come from managers, supervisors, colleagues or clients) are listed below:

- In general, any form of behavior that is **undesirable** to the recipient and **creates an intimidating, hostile, degrading or offensive environment**.
- The following is an indicative (and by no means restrictive) list of forms of conduct that, **under the above conditions**, may constitute cases of violence and harassment at work, such as
- Persistent, inappropriate, lustful/obscene looks, sexual movements/gestures or sounds (e.g. whistling).
- Sexual/sexist comments and offensive questions about appearance, sexual/offensive jokes, sexual comments about the employee's clothing or anatomy.
- Prying and insulting questions about privacy, telling stories of sexual/sexist content.
- Bragging about sexual potency or spreading sexual rumors (including the internet as a medium).
- Generalizations with sexist comments and behaviors that express negative and degrading perceptions about women or any employee belonging to a vulnerable group (e.g. due to age, sexual orientation, race or ethnicity).
- Persistent phone calls, text messages, letters, emails, as well as communication through social media.



- Love poems and letters.
- Obscene/offensive letters, notes and invitations.
- Caresses, touches, hugs, kisses, etc., invasion of personal space (obstruction of a person or obstruction of movements).
- Sexually suggestive gestures, inappropriate or intimidating staring, displaying sexually inappropriate images or videos, sexually suggestive or offensive looks, and whistling.
- Viewing or circulating pornography, sexually explicit images, or cartoons or other sexually explicit images.
- Repeated invitations for social outings, which now embarrass their receiver.
- Unwanted erotic proposals that are inappropriate and unpleasant.
- Requiring a person to dress sexually or in a specific gendered way.
- Paternalistic behavior based on gender.
- Pressure and immoral proposals for sexual activity with the promise of reward (e.g. promotion, wage increase, job retention, etc.), which in short constitute sexual bribery.
- Pressure and immoral suggestions for sexual activity with the threat of sanctions/punishment, which in short constitute sexual coercion.
- Unwanted sexual intent and behavior (physical and/or verbal) of the offender, which creates an offensive, humiliating, hostile work environment for the recipient and, in particular, which may make his/her work difficult, hinder his/her performance, disrupt his/her relationships or hinder his/her development.
- Sexual imposition and/or assault (e.g. rape).

#### **Article 4: SCOPE – POLICY ADDRESSEES**

**a)** This Policy applies to all employees of the Company, regardless of their contractual status, including those employed under a work contract, independent services, salaried mandate, employees through third-party service providers, as well as persons undergoing training, including trainees and apprentices, volunteers, employees whose employment relationship has ended, as well as job applicants, at the Company's headquarters and employees in the informal economy.

**b)** This Policy applies to incidents of violence, harassment and discrimination that occur:

- in the workplace, including public and private places and places where the employee provides work, receives remuneration, takes breaks in particular, for rest or food, in personal hygiene and care areas, changing rooms or accommodation provided by the Company,
- travel to and from work, other travel, travel, education, as well as work-related events and social activities; and
- during work-related communications, including those made through information and communication technologies.

## Article 5: RESPONSIBILITIES

a) The responsibility for the implementation of this Policy lies with the **Administration / General Management**.

b) The responsibility for the coordination of this Policy lies with the Head of Administration and Finance, who is appointed by the Management as the person responsible for conducting and monitoring the complaint handling process, (for the sake of brevity hereinafter referred to as the "**petitioner**"), (see below, **Chapter B - Article 2**). The reference person is responsible for guiding and informing workers on preventing and dealing with violence and harassment at work, receiving, investigating and examining complaints impartially (see Chapter B in more detail below).

c) All Divisions, Departments, directors, supervisors, executives, partners, suppliers and business partners must contribute to the support and implementation of this Policy to combat violence, harassment and discrimination.

d) The Company takes into account the suggestions of the Safety Officer, who assists in the implementation of the provisions of the present Law 4808/2021, in the context of the advisory services provided, regarding the supervision of working conditions (articles 14 and 15 of Law 3850/2010). In particular, the Safety Officer examines the building infrastructure of each facility, especially in areas that pose a high risk to the manifestation of physical and verbal violence behaviors by third parties (e.g. reception or public service areas) and proposes measures to address potential risks through rearrangement of reception areas, operation of emergency exit(s), installation of emergency alert, etc.

e) A relevant report or complaint may be submitted to the Company: i) by the person who suffered the harassment himself (affected person), ii) by a third person who will become aware of the adverse incident (eg another employee or associate, any manager), iii) by the occupational doctor (see in detail **Chapter A - article 6**).

f) The Company must inform the aggrieved party that he/she may, at any stage of the procedure followed within the company for the handling of complaints, also file a complaint with the competent administrative authorities, within their competence (Labour Inspectorate and Ombudsman) and the judicial authorities, at his/her discretion.

g) Every employee must fully comply with this Policy and if he/she becomes aware of any violation of it, in whole or in part, by another employee of the Company, he/she must immediately / ("immediately") inform the Head / Director of the Department to which he/she belongs and/or the Occupational Doctor, who are obliged to immediately transfer it to the "reference" person.

h) It is expressly stipulated herein that causing and/or participating and/or omitting any action due to prevent any incident of violence, harassment and discrimination occurring during work, whether related to or resulting from it, including gender-based violence, harassment and discrimination and sexual harassment constitutes a disciplinary offense. For the imposition of disciplinary sanctions detailed details are made below: (see **Chapter B – Article 3** hereof).

i) It is the right and obligation of every employee who believes that he is a victim of violence, harassment or discrimination to immediately demand from the offender in question to stop such unwanted,

unacceptable and inappropriate activity and to immediately report his concerns to the Head / Director of the Department to which he belongs and / or the Occupational Doctor, who are obliged to transfer it directly to the 'reference' person. In addition, he/she has the right to leave the workplace for a reasonable time, without deprivation of salary or other adverse consequence, if in his/her reasonable belief there is an imminent serious danger to his/her life, health or safety, in particular, when the employer is the perpetrator of such conduct or when he/she fails to take appropriate measures; to restore industrial peace, or when such measures are not sufficient to stop the conduct of violence and harassment. In this case, the outgoing worker is obliged to inform the reference person in advance and in writing, indicating the incident of violence and harassment justifying his belief that a serious danger to his life, health or safety is imminent.

**j)** In any case, it is the Company's highest commitment on the one hand to maintain the confidentiality and security of Personal Data (PD), which are collected during the implementation of this Policy and on the other hand to comply with the applicable European and national legislation on the Protection of Personal Data (EU General Data Protection Regulation 2016/679 – GDPR and the implementing Law 4624/2019).

#### **Article 6: RESPONSIBILITIES OF AN OCCUPATIONAL DOCTOR**

The Company takes into account the advice and directions of the Occupational Doctor (article 8 of Law 4808/2021). In particular, the Occupational Doctor advises on issues, indicatively: a) physiology and psychology of work, including the prevention of violence and harassment at work, including sexual harassment, ergonomics and hygiene of work, arrangement and configuration of positions and the working environment and organization of the production process, b) organization of a first aid service, (c) initial placement and change of job for health, physical or mental reasons, temporarily or permanently, as well as the integration or reintegration of persons discriminated against or victims of violence and harassment, including sexual harassment, as well as victims of domestic violence in the production process, including with an indication of retraining or reasonable adjustments to the job.';

The Occupational Doctor supervises the implementation of measures to protect the health of employees and prevent accidents. To this end: (a) regularly inspect workstations and report any omissions, propose measures to remedy omissions and supervise their implementation, (b) explain the need for proper use of personal protective measures, (c) investigate the causes of psychosocial risks and work-related diseases, analyse and evaluate the results of research and propose measures to prevent them; (d) supervise workers' compliance with workers' health and safety rules, inform workers of the risks arising from their work and of ways to prevent them, including the risks of violence and harassment, including sexual harassment; (e) provide emergency treatment, in particular in the event of an accident, incident of violence or sudden illness, and carry out vaccination programmes for workers on its orders competent public health service of the region where the Company is based.

Finally, the Occupational Doctor may submit a report – complaint on behalf of the person – employee who suffered the harassment of any form and kind, which came to the knowledge of the Doctor, during the process of examining and taking the medical history of the employee. The above report by the Occupational Doctor is always made with the agreement of the employee.

## **CHAPTER B: HANDLING OF COMPLAINTS/PETITIONS**

### **Article 1: PROCEDURE FOR RECEIVING AND DEALING WITH INTERNAL COMPLAINTS**

Reports of abusive conduct of violence, harassment or discrimination that violate this Policy will be accepted:

- **in writing**, via e-mail to the Company's e-mail address [thv@developmentfariagroup.com](mailto:thv@developmentfariagroup.com), addressed to the "report" person **appointed by the Management to conduct and monitor this process** (see article 2 below),
- **orally**, by telephone and/or face-to-face meeting, to the "petitioner" person. **Although the employee is advised to first seek assistance from the "reference" person, he/she may, at any time, raise his/her concerns and submit a report to the immediate Head / Director of the Department to which he/she belongs and/or the Occupational Doctor, who are obliged to transfer it immediately to the "reference" person with the agreement of the affected person person – employee.**

The Company encourages named reports and is committed to the non-existence of any retaliation or stigmatization on the person submitting the report / complaint. The importance of submitting named complaints lies in the fact that anonymous reports make the task of thoroughly investigating each unpleasant incident extremely difficult or even impossible, due to the difficulty of providing accurate and additional information from an anonymous complainant, as well as assessing the credibility of the report. However, even anonymous reports will be taken seriously and investigated. In particular, anonymous reports submitted are examined according to their degree of documentation and the possibility of detecting behavior incompatible with this Policy. In any case, the Company undertakes to maintain the anonymity of the complainant and not to take actions that may lead to the disclosure of his identity, unless such disclosure is required by judicial or legal proceedings, in the context of the investigation of each incident.

Finally, the retention and processing of personal data is carried out in accordance with the provisions of the applicable European and national legislation on the Protection of Personal Data (EU General Data Protection Regulation 2016/679 – GDPR and the implementing Law 4624/2019).

### **Article 2: PROCEDURE FOR INVESTIGATING COMPLAINTS/PETITIONS**

The Company appoints a "reference" person for the investigation of complaints and complaints, **the Head of Administration and Finance (Chapter A - article 5)**, and **specifically Mrs. VALKOUMA EFTHALIA, tel. 6948305245, [thv@developmentfariagroup.com](mailto:thv@developmentfariagroup.com)**, who is committed on the one hand to maintaining the confidentiality and security of Personal Data collected in the performance of his duties, and on the other hand, for its compliance with the applicable European and national legislation on the Protection of Personal Data, (EU General Data Protection Regulation 2016/679 – GDPR and the implementing Law 4624/2019).

The "reference" person undertakes the main obligation to guide, inform, train and sensitize employees regarding the prevention and handling of violence, harassment and discrimination in the workplace and the control of the implementation of this Policy by all employees. Its main role is the immediate and thorough investigation of each submitted report. After submitting the petition/complaint, That person will:

- collect information and accurately record the dates of reported misconduct and misconduct;
- clarify the complainant's expectations regarding the results of his report;
- discuss and agree with the complainant on the next steps in handling the complaint (e.g. the choice of formal or informal reporting, without the choice of informal reporting precluding formal reporting);
- keep a record of all discussions that have taken place, to which there is limited accessibility.
- confirms that the complainant is aware that he or she may report the act or conduct incompatible with this Policy outside the Company, through the national legal system, such as by filing a lawsuit before the Civil Courts as well as by appealing to the Labour Inspectorate and the Ombudsman, as a body promoting and supervising the principle of equal treatment; according to Law 3896/2010 & Law 4443/2016.

Any person (aggrieved or a third party) who reports an incident of violence or harassment or discrimination has the Company's assurance of:

- protection against retaliatory behaviour or retaliation in the event of reporting of violence, harassment or discrimination;
- the impartial investigation of the allegations and the taking of appropriate measures to address the report appropriately;
- maintaining the confidentiality and personal data of the persons involved during the examination of the complaint;
- maintaining such allegations made in the context of the report/complaint in full confidentiality, to the extent practicable;
- the full and immediate information of the person who submitted the report about the results of the investigation and the related actions implemented.

Upon completion of the investigation, the reference person submits a written report to the Company's Management, stating the result of the investigations. The results of the investigation are communicated simultaneously to both the complainant and the accused/infringer, so that they become aware of them. The conclusion of the investigation and the submission and communication of the reference person's finding must take place as soon as possible and in any event no later than three (3) weeks from the date of submission of the complaint by the reporting person.

### **Article 3: DECISION-MAKING PROCEDURE AND IMPOSITION OF DISCIPLINARY SANCTIONS**

In case of violation of this Policy, the Administration / General Directorate is responsible for deciding to impose a disciplinary penalty on the offender, which may take into account the opinion of the "reporter" on the specific incident of violence / harassment and alternatively of the Occupational Doctor on each

incident, as to the circumstances of its occurrence, and especially in those cases where the Occupational Doctor is initially involved, during the process of receiving the complaint / report.

After carefully reviewing the information gathered during the investigation and reaching specific conclusions, the Company will take appropriate, appropriate and necessary actions and announce its decision to the complainant and the alleged infringer. If the conclusion of the investigation is that, indeed, conduct has occurred inappropriate and incompatible with this Policy, the Company will take appropriate, appropriate and necessary disciplinary action. below, among which may be imposed the penalty of dismissal, as a last resort punitive measure, depending on the severity and importance of the violation of this Policy.

The disciplinary sanctions (penalties) are imposed by the Management – General Management of the Company, as responsible for disciplinary compliance and are the following:

- **Oral or written observation;**
- **Written reprimand,**
- **Moving the** alleged offender to another location, shift, department or branch (if any) or changing working hours;
- **The agreement to provide telework** of the alleged offender,
- **Referral to mental health specialists** for counseling/psychological counseling support to the violator of this Policy.
- **The termination of the offender's** employment relationship.

**(B) When** sentencing, the principle of proportionality and of an appropriate, appropriate and necessary means shall be applied and account shall be taken of any aggravating or mitigating circumstances, in particular:

**(i) Mitigating circumstances**

- isolated incident,
- the employee's conduct was due to a justified lack of knowledge of the Policy;
- the employee had not received training regarding the violated Company Policy;
- The employee himself reported the violation.

**(ii) Aggravating circumstances**

- Repetitive or repeated behavior
- Intentional (fraudulent) conduct
- The behavior was due to gross negligence or carelessness
- The employee had been instructed or disciplined for similar conduct.

#### **Article 4: MEASURES TO PREVENT, CONTROL, CONTAIN AND RESPOND TO RISKS AND MONITOR SUCH OCCURRENCES OR BEHAVIOUR.**

The Company takes measures to prevent, control, mitigate and address these risks, as well as to monitor such incidents or forms of behavior, which indicatively and not restrictively are the following:

- Recommendation of a strict recommendation to all attendees in the workplace (managers, supervisors, employees with any employment status, suppliers, even customers) to promote and safeguard a healthy working environment, where absolute respect for human dignity and the personality of the individual, cooperation and mutual aid are basic values and at the same time fundamental obligations of all.
- Encouragement of open communication of the recipient of any form of harassment and violence with the employer, supervisors and colleagues.
- Guarantee of objective and dispassionate examination of any complaints.
- Assurance of the absence of retaliation against the complainant by the company, as well as managers, supervisors, colleagues, suppliers and even customers.
- Cooperation with specially trained professionals in order to ensure objective, impartial, but also effective management of reports/complaints.
- Training of employees in the procedures for managing incidents of violence / harassment that the employer will assign the relevant tasks.
- Evaluation on a regular basis of the effectiveness of the implemented preventive and response measures and review-update of the risk assessment and the aforementioned measures.
- Guidance and support to victims of violence and harassment or victims of domestic violence to reintegrate into the workplace.
- In particular, granting them three days' paid leave, if it is proven that they have suffered violence and/or harassment, particularly serious that makes it objectively difficult for them to work with a sense of security, with a view to their smooth return to the workplace.
- Ensuring adequate lighting in workplaces.
- Evaluate on a regular basis the effectiveness of the preventive and response measures implemented and review/update the assessment of risks and measures.

#### **Article 5: COOPERATION AND PROVISION OF ALL RELEVANT INFORMATION TO COMPETENT AUTHORITIES**

The Company and the reference person For the reception and management of such complaints at company level, they cooperate with any competent public, administrative or judicial authority, which, either ex officio or following a request by an affected person, within the framework of its competence, requests the provision of data or information and undertakes to provide assistance and access to any requested and generally necessary data for the diagnosis of the truth. For this purpose, any data they collect, in any form, are retained in compliance with the provisions of Law 4624/2019 (A'137) (on the protection of personal data).

#### **Article 6: INFORMATION AND AWARENESS-RAISING MEASURES FOR STAFF**

The Company:

- undertakes to provide staff with information and information in accessible formats, as appropriate, on the risks of violence and harassment, as well as on related prevention and protection measures, on the procedures existing at company level and on the possibilities given by law in case of such incidents.
- organise targeted staff meetings to discuss relevant issues and address potential risks in a timely manner.
- It will conduct seminars for all employees with specially trained professionals on issues of prevention and handling of incidents of violence and harassment.

**Article 7: INFORMATION ON THE RIGHTS AND OBLIGATIONS OF EMPLOYEES AND THE EMPLOYER, AS WELL AS PERSONS EXERCISING MANAGERIAL RIGHTS OR REPRESENTING THE EMPLOYER, TO THE EXTENT AND TO THE EXTENT OF THEIR OWN RESPONSIBILITY, IN THE EVENT OF OCCURRENCE OR REPORTING OR REPORTING OF SUCH INCIDENTS, AND ON THE RELEVANT PROCEDURE**

- In case a person is affected by an incident of violence or harassment during access to employment, during the employment relationship or even if the employment contract or employment relationship in the context of which the incident or behavior allegedly occurred has expired, he has the right to: **a) judicial protection, b) appeal, complaint and application for labor dispute to the Labour Inspectorate, within the framework of its legal competences, c) reporting to the Ombudsman, within the framework of its legal competences, as well as d) a complaint within the company in accordance with the applicable complaint management policy of the company. In any case, when such behavior is reported or reported within the company, the affected person reserves every right to appeal to any competent authority.**
- For the convenience of employees and any affected person in general, the contact details of the competent bodies for protection from any incidents of violence and harassment at work are provided:
  - Complaints hotline of the Independent Labour Inspection Authority through the citizens' service line **1555**
  - Hotline for the direct psychological support and counseling service for women victims of gender-based violence **SOS Hotline 15900**

**CHAPTER C: FINAL PROVISIONS**

**Article 1: POLICY REVIEW AND INSPECTION**

The Company recognizes the importance of controlling and evaluating the effectiveness of this Policy and ensures the anonymous collection of statistical data and data, such as number of incidents, response, etc. The review of this Policy is set to take place on an annual basis and the Company will proceed, if necessary, to any amendments / adjustments thereof.



## **Article 2: ENTRY INTO FORCE**

This Policy and its amendments come into force upon its posting, in printed form, on the Company's bulletin boards, in accessible for all employees points of the workplace, as well as in electronic form, accessible to the Company's internal network (intranet), so that it is easily and immediately available to all Company staff.



## Anti-Bribery Policy for FARIA Renewables S.A.

As of 2024-09-01 FARIA Renewables S.A. has approved and adopted the following policy.

### Purpose:

This Anti-Bribery Policy outlines Faria Renewables' commitment to conducting business ethically and in compliance with all applicable laws and regulations. It prohibits bribery and corruption in all forms, both domestically and internationally.

### Scope:

This policy applies to all employees, contractors, agents, and other representatives of Faria Renewables, regardless of their position or location.

### Prohibited Activities:

- **Bribery:** Offering, giving, receiving, or soliciting any form of bribe or kickback in connection with business activities.
- **Corruption:** Engaging in any corrupt practice, including extortion, embezzlement, and fraud.
- **Facilitation Payments:** Making or accepting facilitation payments, even if they are legal under local law.

### Reporting Requirements:

- **Mandatory Reporting:** Employees are required to report any suspected or actual instances of bribery or corruption to the Legal Counsel or other designated personnel.
- **Protection of Whistleblowers:** Faria Renewables will protect whistleblowers from retaliation.

### Investigations and Disciplinary Actions:

- **Prompt Investigations:** All reports of bribery or corruption will be promptly investigated.
- **Disciplinary Actions:** Faria Renewables will take appropriate disciplinary action against any employee found to have violated this policy.



### Third-Party Relationships:

- **Due Diligence:** Faria Renewables will conduct due diligence on third parties with whom it conducts business to assess their compliance with anti-bribery laws.
- **Contractual Provisions:** Contracts with third parties will include anti-bribery clauses.

### Training and Awareness:

- **Regular Training:** Faria Renewables will provide regular training to all employees on the content of this policy and the applicable laws and regulations.

### Legal Counsel:

- **Legal Counsel:** A designated Legal Counsel will be responsible for overseeing the implementation and enforcement of this policy.

### Review and Updates:

- **Periodic Review:** This policy will be reviewed and updated periodically to ensure its continued effectiveness.

**By adhering to this Anti-Bribery Policy, Faria Renewables aims to maintain a reputation for integrity and ethical conduct.**



## Anti-Corruption Policy for FARIA Renewables S.A.

As of 2024-09-01 FARIA Renewables S.A. has approved and adopted the following policy.

### Purpose and Commitment

FARIA Renewables S.A. is fully committed to conducting business ethically, transparently, and in compliance with all applicable anti-corruption laws. We adopt a zero-tolerance approach to corruption and bribery in any form, recognizing that such practices harm business integrity, distort fair competition, and damage the trust of stakeholders. This policy applies to all employees, directors, contractors, and business partners acting on behalf of FARIA Renewables.

### Scope

This Anti-Corruption Policy applies to all business activities undertaken by FARIA Renewables S.A. globally, covering interactions with government officials, suppliers, clients, and any third parties. It prohibits:

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence a business decision.
- **Facilitation Payments:** Small, unofficial payments made to expedite routine government actions.
- **Kickbacks:** Returning a portion of a payment as a reward for securing business advantages.
- **Conflicts of Interest:** Engaging in activities where personal interests conflict with the company's interests.

### Gifts, Hospitality, and Donations

FARIA Renewables prohibits gifts, hospitality, or any form of entertainment that could be perceived as a bribe or influence. All such expenses must be modest, transparent, and appropriately approved. Charitable donations or sponsorships are permitted but must not be used to secure improper business advantages. Political donations are strictly prohibited.

### Responsibilities

- **Employees:** All employees are responsible for understanding and adhering to this policy. They must report any suspected corruption or bribery via the company's reporting mechanisms. Violations of this policy may result in disciplinary actions, including dismissal.
- **Leadership and Compliance Officer:** Management is responsible for ensuring compliance with this policy, leading by example, and fostering a culture of integrity. The Compliance Officer will oversee the enforcement of the policy, including regular training, monitoring, and addressing reports of corruption.



## Reporting and Whistleblowing

FARIA Renewables encourages all employees to report any suspicious activities or violations of this policy. Reports can be made confidentially and without fear of retaliation through the company's whistleblowing channels. All concerns will be thoroughly investigated.

## Training and Awareness

All employees must participate in regular anti-corruption training to understand their responsibilities under this policy and applicable laws.

## Conclusion

FARIA Renewables S.A. is committed to maintaining a high standard of ethical conduct. By adhering to this policy, we ensure that our business is conducted with integrity, fairness, and in full compliance with global anti-corruption laws.