



cosmos

EXPERTS IN ALUMINIUM™

**Policy on the Prevention, Combating &
Management of Violence and
Harassment at Work**



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Version 2024 #1

1. COMMITMENT

Cosmos Aluminium (hereinafter the Company) demonstrates zero tolerance to incidents of violence and harassment inside and outside its facilities by any person and respects to the fullest extent the right of every person to work in an environment free of violence, discrimination and harassment.

It undertakes to comply with its obligations arising from the provisions of l. 4808/2021 on preventing and responding to all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, occurring in the course of, or in connection with, or arising from work.

It is noted that the company does not tolerate incidents of violence and harassment:

- In all Group facilities where employees provide work, are paid, take a rest or meal break, in the personal hygiene areas, changing rooms, car parks, outdoor areas and in all offices provided by the company to employees,
- In areas outside the Group's premises that are however work-related, such as during business trips, training programmes, events or social activities, but also on the way to and from work,
- On employee communications, including those made through information and communication technologies (SMS, email, social media, letters).

This policy is adopted in accordance with Articles 9 and 10 of Part II of Law 4808/2021 and the regulatory legislation implementing them.



2. AIM

The aim of this Policy is to:

- Provide information to all its employees on employment protection and the fight against all forms of violence and harassment in the workplace,
- To formulate measures to prevent and reduce the risks of violence and harassment at work,
- To provide information on the management measures the company has put in place to prevent the recurrence of such incidents,
- To establish this as a basic requirement for employees, suppliers and partners to work with the company,
- To formulate the company's responsibilities and obligations towards its employees with regard to preventing and addressing violence and harassment in the workplace,
- To ensure that this is effectively implemented and updated at regular intervals.

3. PROTECTED PERSONS WORKERS

This policy covers all employees and workers of Cosmos Aluminium, irrespective of their contractual status, including those employed under a work contract, independent services, salaried order, those employed through third-party service providers, persons undergoing training, including trainees and apprentices, volunteers, persons whose employment relationship has ended, job applicants and other persons dealing or cooperating with the company.

4. PROHIBITED FORMS OF BEHAVIOUR - DEFINITIONS

4.1 Prohibition of violence and harassment at work

The company strictly prohibits any form of violence and harassment, as defined in Article 4 of Part II of Law 4808/2021.



4.2 Forms of violence and harassment - indicative reference to prohibitions

The following forms of violence and harassment are strictly prohibited, but are not limited to those:

- Verbal or written sexual harassment or related innuendos and insults directed at employees who do not explicitly accept such comments. It also applies to comments and innuendos referring to the offer of benefits, such as a pay rise, career advancement in exchange for sexual favours.
- Comments with obscene gestures, with written or verbal threats, with malicious and mocking expressions of discrimination based on sex, race, religion, appearance, age, disability or sexual orientation or other personal choices, and the dissemination of such expressions.
- Threats of retaliation after rejecting sexual proposals.
- Cyberbullying and all forms of harassment conducted through visual material such as posters, cartoons, caricatures, photographs or videos that are derogatory to the person based on the characteristics conducted by law.
- Persistent offensive questions about personal life, marital status and sexual preferences. It includes persistent offers of appointments under psychological pressure or violence.
- Sexual gestures or acts involving unwanted physical contact with the purpose of violence, diminishing human dignity or pressure to enter into a sexual relationship.
- Conversations and communications with obscene, threatening or offensive content.
- Any form of coercion into sexual intercourse.
- Insults and/or threats aimed at humiliating the person or belittling his/her mental and physical abilities or inflicting physical, gender-based or psychological violence.
- Destruction of personal effects or property.
- Acts of obstructing the performance of a person's work, movement or physical integrity or physically following or stalking a person.

5. ASSESSMENT OF THE RISKS OF VIOLENCE AND HARASSMENT AT WORK

The company has an "Occupational Risk Assessment Study" (ORAS), which systematically examines each type of job and tasks performed at its facilities. The study identifies the sources of occupational risk and lists the protection and prevention measures already in place and/or proposed to be taken to protect workers, including the risks and measures to combat violence and harassment at work, including sexual harassment.

In particular, it is noted that this study includes the identification and assessment of psychosocial risks, including the risks of violence and harassment in the workplace, including sexual harassment. The assessment of these risks is the subject of cooperation between the Departments, the Directorates and the Occupational Physician, in order to properly assess them and consequently improve working conditions by taking measures to prevent, control and reduce incidents of violence and harassment. Estimated time to complete the study: within 3 months:

6. MEASURES TO PREVENT, CONTROL, CONTAIN AND RESPOND TO VIOLENCE AND HARASSMENT

The company takes measures to prevent, control, reduce and address workplace violence and harassment, including sexual harassment, through the establishment of the following practices and as recorded in ORAS:

- **Adoption of this Policy** and communication of this policy on the company's website.
- **Collective information, awareness and training of employees** on the content of this Policy. In particular, it is ensured that they are trained in the "Internal Complaints Management Procedure" (see Section 11 below) to ensure that employees understand their rights and that any such incident is recorded and resolved with human dignity and confidentiality. A record is kept.
- **Open communication of employees** with the President and Vice President and the immediate superiors of each department.
- **Individual information for employees** of the contents of this Policy in positions with a higher risk of violence and harassment incidents.
- **Encouragement of employees and managers** to participate in training programmes on the recognition and management of such incidents.
- **Definition of reference person** ("contact")
- **Support for affected workers** on their return to work.
- **Regular evaluation of effectiveness** of the preventive and response measures in place and updating of the assessment of risks and measures.



7. INFORMATION AND AWARENESS-RAISING ACTIVITIES FOR EMPLOYEES

The company undertakes the following actions to inform and raise awareness of employees on issues of violence and harassment at work:

- Posting the "Internal Complaint Management Procedure" (see Section 11 below) on the bulletin boards of all Departments.
- Controlled distribution via email of:
 - This Policy
 - The contact details of the reference person ("contact")
 - Contact details of the competent administrative authorities for the exercise of the right of appeal by any affected person
- Personal communication of senior managers at the level of direct managers and superiors with employees at regular intervals on relevant issues, such as:
 - Encouraging the maintenance of a working climate where respect for human dignity, cooperation and mutual assistance are core values,
 - Raising awareness on these issues,
 - Scheduling collective meetings for discussion (when necessary).
- Individual briefing of employees by the Occupational Physician at regular intervals on relevant issues, as appropriate.
- Provision education by any appropriate means and media to interested parties, e.g. use of audiovisual media, implementation of seminars with experts, training on procedures for handling incidents of violence and reports/complaints.

8. INFORMATION ON THE RIGHTS AND OBLIGATIONS OF WORKERS AND THE EMPLOYER IN THE EVENT OF AN INCIDENT OF VIOLENCE AND HARASSMENT AND ON THE PROCEDURE TO BE FOLLOWED

8.1 Rights of the person affected by an incident of violence and harassment

According to the legislation, a person who is affected by an incident of violence and harassment in access to employment, during the employment relationship or even if the contract or employment relationship under which the incident or conduct is alleged to have occurred has ended, has the:





Policy on the Prevention, Combating & Management of Violence and Harassment at Work

Version 2024 #1

- Right to judicial protection
- Right to file a claim, a complaint and a request for an industrial dispute with the Labour Inspectorate, within the framework of its statutory powers
- Right to report to the Ombudsman, within the framework of his/her statutory powers, and
- Right to file a complaint within the company, in accordance with the internal complaint management procedure provided for in paragraph 11 hereof. The complaint cannot be made anonymously.

- In any case, he or she reserves the right to leave the workplace for a reasonable period of time, after giving written notice to the reference person, without loss of pay or retaliation or other reprisal, if he or she believes that:
 - There is a risk to his or her life, health or safety, in particular where the perpetrator is the employer or a person exercising managerial authority.
 - Appropriate measures have not been taken to resolve the incident and eliminate the possibility of a recurrence of similar behaviour of violence and harassment.

8.2 Right of the company

In accordance with the provisions of article 18 of Law 4808/2021, the company takes into account the following.

In cases where there is no risk or there has been a risk and the possibility of the risk reappearing has been eliminated, and the affected worker refuses to return to work, the company has the right to appeal to the Labour Inspectorate to have the dispute resolved.






Policy on the Prevention, Combating & Management of Violence and Harassment at Work


Version 2024 #1

8.3 Contact details of the competent administrative authorities to which the person concerned has the right to appeal

Department of Labour Relations Inspection of Larissa

 Farsalon 6, 41335 Larissa

 tkelarisas@yeka.gr

 Opening hours for the public: Monday - Friday
09.00 a.m. -13:00pm.



2410 – 625 650
2410 – 671 910
2410 – 624 923

Telephone number for complaints to the Labour Inspectorate

Single contact number for citizens on insurance, labour and social issues


 Operation 24 hours / 7 days a week




OMBUDSMAN

Department of Labour Relations Inspection of Larissa

 17 Chalkokondyli str , P.C. 104 32 ATHENS

 press@synigoros.gr

 Opening hours for the public: Monday – Friday
08.30 a.m. -14:00pm



213 – 1306 600

Direct psychological support and counselling service for women victims of gender-based violence



Line SOS **15900**



9. PROTECTING EMPLOYMENT AND SUPPORTING WORKERS WHO ARE VICTIMS OF DOMESTIC VIOLENCE, WHERE POSSIBLE, BY ALL APPROPRIATE MEANS, THE REASONABLE ACCOMMODATION

The company recognizes its social responsibility towards incidents of domestic violence, which may or may not take place in the workplace of its employees and declares its practical support for them in every possible way and means.

Domestic violence may take place through physical violence or sexual harassment or stalking by current or former partners or spouses who are in the same work environment. In addition, these forms of violence inflicted on the worker during teleworking are also recognised.

10. INTERNAL COMPLAINTS PROCEDURE

10.1 Procedure for receiving complaints

The Company is committed to fostering a business spirit of transparency and responsibility. Therefore, it demands the highest possible level of professional and ethical conduct from all its employees and business partners. In order to establish the prevention of offences, unethical and illegal behaviour, we want to make sure that any person who has suspicions about the above issues regarding the operation of our Company has the opportunity to report them (remaining anonymous if they wish) without fear of reprisals from the Company's side.

In this context, we have developed a partnership with an independent, external complaints system to make it easier and safer to report complaints:



<https://whistleblowersoftware.com/secure/994a6dff-5e31-4767-b328-b94bc06f6dd7>

Alternatively, the employee may submit an oral or written complaint before the Reference Person or his/her deputy.

A Reference Person ("Contact") for the purposes of this policy is appointed Mrs. Stella Keoglou. Tel.: 210 4898520 email: skeoglou@etem.com

A deputy Reference Person ("Contact") for the purposes of this policy is appointed Mrs. Nikoleta Katsika. 2410 567542 email: nkatsika@cosmosaluminium.gr in cases of absence or impediment or conflict of interest of the regular reference person. Where reference is made in this policy to the Reference Person, this includes the Reference Person's deputy.



10.2 Breach management procedure

In this context:

- The Reference Person must promptly investigate any complaint and collect all the required information with absolute discretion, confidentiality, impartiality and respect for human dignity.
- The Reference Person may examine witnesses, as well as superiors to whom the aggrieved person has addressed, interview the complainant and the complainant, and request the production of documents and evidence.
- The offended person will receive regular updates on the progress of the investigation of his/her complaint and will receive the results of the investigation at the end.
- The Reference Person shall make every effort to resolve the incident in an amicable manner, if possible.
- If the offended person so wishes, the company shall transfer him/her to another job or modify his/her working hours or may move the complainant to another job, both during and at the end of the investigation.
- The information and data collected are marked strictly confidential and are kept by the Reference Person as confidential material.
- The Reference Person shall inform the Company's Management of the existence of a complaint and submit a written report to the Company's Management with the results of the investigation. The results shall be communicated to the complainant and the respondent at the same time, so that they can take note of them.
- The investigation of the report/complaint and the drafting of findings should take place as soon as possible and no later than 3 weeks after the complaint is made.

10.3 Prohibition of retaliation against the offended person

- The company undertakes to comply with the obligation to prohibit retaliation against affected persons, in accordance with article 13 of I. 4808/2021 and with the provisions of the labour legislation.
- It stresses that all incidents will be handled and investigated objectively and is committed to respecting the confidentiality and protection of Personal Data. It expressly prohibits any unfavourable treatment of the offended person by any employee or company officials and shall ensure that the offended person is promptly removed from the scene of the incident to avoid retaliation against him/her for reporting an incident of violence and harassment.



10.4 Description of the consequences of ascertainment of violations

- In any case, the company shall invite the respondent to make a statement before taking any decision, unless it considers that it endangers the person concerned or has conclusive evidence as to whether or not the act in question was committed.
- The company shall take all appropriate measures against the respondent, which may include, but are not limited to:
 - Compliance recommendation
 - Change of post, working hours, place and manner of work,
 - Termination of the employment contract
 - Referral of the case to the competent authorities (SEPE, judicial and prosecutorial authorities, Ombudsman, etc.), if the incident is considered illegal and entails criminal or administrative sanctions.
 - Finally, the company also examines cases of blatantly malicious complaints, which are further investigated and handled on a case-by-case basis and in every legal way and means, without offending the dignity of the complainant

10.5 Cooperation and provision of all relevant information to the competent authorities

The company, the Contact and any other person responsible for receiving and managing complaints of violence and harassment shall cooperate with any competent public, administrative or judicial authority, which, either on its own initiative or upon request by an affected person, within the scope of its competence, requests the provision of data or information. The company is committed to providing assistance and access to such data. In this context, any information collected, whether in paper or electronic form, is retained by the Reference Person in compliance with the provisions of personal data protection legislation.

11. COMMUNICATION OF THE CONTENT OF THIS POLICY

The present policy is communicated to all the employees of the company with any available means and is posted on work areas and the company's website.





12. RESPONSIBILITY FOR THE POLICY

▪ **Adoption and review:**

This Policy has been approved by the Board of Directors and is signed by the Chairman of the Board of Directors. In the event of any differences between the content of this policy and the applicable national legislation or other applicable standards, the most stringent requirements shall prevail.

▪ **Application monitoring:**

A competent management team (Board Members, Chief Financial Officer, Chief Commercial Officer, Chief Production Officer) is responsible for reviewing and monitoring the content of this document at least once a year during the Regular Management Review. In addition, this group will oversee the provision of training for the needs of the present policy.

The Chairman of the Board

Xenofon I. Kantonias





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