

HUMAN RIGHTS POLICY

“HAIDEMENOS MODEL INDUSTRY OF GRAPHIC ARTS S.A.”

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Πίνακας Αναθεωρήσεων

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1. INTRODUCTION

The Company “HAIDEMENOS S.A, being deeply sensitive to the respect of human rights, applies Policies and Procedures that condemn all forms of discrimination and guarantee the respect of all its social partners throughout its activities.

The present Human Rights Policy sets out a framework of basic principles that govern the company's internal relations with its management and employees, as well as the company's external relations with those who deal with it and those who are affected in any way by its operation.

2. SCOPE OF APPLICATION

The Human Rights Policy is binding for the Management, employees with a dependent employment contract, employees providing services under any kind of engagement, project contract, independent services or project. In the field of customers and suppliers, the Company takes appropriate measures to ensure that they also adopt the same principles of respect for human rights, and seeks not to do business with those who do not embrace them.

3. SOURCES

For the preparation of this policy, the national and EU legislation as well as the following international texts have been taken into account:

Universal Declaration of Human Rights

United Nations Convention on the Rights of the Child

United Nations Global Compact

United Nations Convention on the Elimination of All Forms of Discrimination
Against Women

United Nations Guiding Principles on Business and Human Rights

Women’s Empowerment Principles of United Nations Organization

Charter of Fundamental Rights of the European Union

Conventions of International Labour Organization on core labour standards and
recommendations on labour and social standards

General Principles and Operational Guidelines of International Labour Organization for fair
recruitment and definition of recruitment fees and related costs

Governance Conventions of International Labour Organization

4. HUMAN RIGHTS

4.1 RESPECT OF HUMAN RIGHTS

The Company respects human rights and diversity, condemns all forms of social exclusion and all forms of discrimination, including but not limited to race, origin, gender, age, religion, special needs, sexual orientation, etc., and promotes equal opportunities and fair treatment of employees.

4.2. WORKING CONDITIONS

The Company provides a healthy, safe and humane working environment for its employees and conditions of advancement and remuneration that ensure the human dignity and well-being of employees. As part of its occupational health and safety policy, the Company places particular emphasis on the safety of its facilities and workplaces and takes steps to control and implement appropriate safe working facilities and provide health and safety training and education to its employees. Protecting the life, health and safety of employees is a top priority for the Company.

4.3 EQUAL OPPORTUNITIES AND EQUAL TREATMENT OF MEN AND WOMEN

The Company applies the principle of equal opportunities and equal treatment of men and women with regard to access to and advancement in employment and working conditions and terms, including remuneration.

Any form of direct or indirect discrimination based on the sex or marital status of an employee shall be prohibited in terms of access to employment, terms and conditions of employment, promotion, planning and implementation of staff appraisal systems.

The termination or in any manner whatsoever of the employment relationship and any other discriminatory treatment on grounds of sex or marital status shall be prohibited.

4.4. PROHIBITION OF DISCRIMINATION AND PRINCIPLE OF EQUAL TREATMENT OF THE EMPLOYEES

The Company unequivocally condemns and prohibits any discrimination between employees on the grounds of race, color, national or ethnic origin, ancestry, religious or other beliefs, disability or chronic disease, age, marital or social status, sexual orientation, gender identity or gender characteristics.

The Company applies the principle of equal treatment of employees, irrespective of the above characteristics, with regard to (a) conditions of access to employment, including selection criteria and conditions of recruitment and at all levels of the professional hierarchy, as well as conditions of career and professional development, and (b) terms and conditions of employment, in particular with regard to remuneration, dismissal, health and safety at work.

4.5. PROHIBITION OF CHILD LABOUR

The Company categorically condemns child labour and has zero tolerance for any form of exploitation of children.

The Company checks and complies with the age limits set by law for each position and type of work, and in particular with regard to work that involves a risk to physical or mental health and safety.

In the case of employment of a minor, the Company strictly applies the applicable legislation on employment time limits and remuneration and never employs a minor in heavy, dangerous or unhealthy work

4.6. PROHIBITION OF SLAVERY, TRAFFICKING AND FORCED LABOUR

The Company explicitly condemns slavery, human trafficking, forced labour and any form of forced labour and declares its zero tolerance to it.

No work is forced or compulsory and all employees of the Company work of their own free will, having taken up their jobs of their own free will and not under compulsion, and have the right to resign if they wish to do so.

4.7. PROHIBITION OF VIOLENCE AND HARASSMENT

The Company condemns violence and harassment at work and demonstrates zero tolerance for these forms of behaviour by adopting procedures to prevent, control, contain, monitor and respond to incidents and behaviours of violence and harassment. The Company applies a Policy for Combating Violence and Harassment at Work and for the Management of Internal Complaints in accordance with the provisions of Articles 9 and 10 of Law 4808/2021.

4.8. FREEDOM OF ASSOCIATION

The Company recognizes and respects the right to freedom of association of employees and is committed to facilitate employees in exercising their right and to encourage meaningful and constructive communication with legally elected employee associations. In this context, both sides must comply with the applicable legislation and seek to build mutual trust and prospective cooperation to promote the interests of both sides.

4.9. PERSONAL DATA

The Company respects the personal data of all individuals, fully complies with the national and EU legislation and implements policies and technical and organizational measures for the safe and lawful processing of personal data that come to its knowledge.

4.10. CORRUPTION

The Company adopts measures in favour of transparency and condemns corruption and in no case allows bribery, illegal payments and unfair practices. Employees and members of the Board of Directors in the performance of their duties shall not accept gifts, payments or other favours from third parties (e.g. customers, suppliers, competitors, other employees, etc.) to promote or delay matters relating to their duties.

4.11. PRODUCT SAFETY

The Company fully complies with the legislation concerning the safety of the products and services it provides and observes good practices that contribute to the protection of the life, health and safety of its customers and end consumers.

4.12. ENVIRONMENT - SOCIETY

The protection and respect of the environment and society is a top priority of the Company. Compliance with the relevant national and EU legislation is self-evident for the Company, which is committed, in addition to its legal obligations, to seek continuous improvement for the protection of the natural environment. The Company is committed to applying environmentally sound business practices in order to reduce its environmental impact and to contribute, among other things, to the reduction of CO2 emissions, the avoidance of pollution, the energy saving and the conservation and preservation of natural resources, while continuously evaluating and improving its practices and setting new targets for the protection of the natural environment. While protecting the environment, the company also takes care of the protection of its employees and the society in which it operates by applying safe technologies and operating procedures, as well as producing safe products, while at the same time organizing social actions and encouraging employees and third parties to participate in them.

5. IMPLEMENTATION OF THE POLICY

Compliance with this Policy is mandatory for the Management and employees of the Company. Management, Directors and Department Heads are responsible for informing employees of the Principles of the Policy, verifying compliance with this Policy and encouraging employees to report incidents of violation of the Policy in accordance with the procedure set forth in the "Policy and Procedure for Filing and Managing Reports and Complaints" established and implemented by the Company. The protection of complainants and the prohibition of retaliation are key principles of the above Policy.

6. REVIEW OF THE POLICY

The present Human Rights Policy is subject to periodic review and updating as and when required.